

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	2:19-CV-767-ECM-SMD
DYNAMIC SECURITY, INC.,)	
)	
Defendant.)	

**DECLARATION OF LESLIE PALMER IN SUPPORT OF PETITION FOR
THE AWARD OF ATTORNEYS' FEES AND EXPENSES**

1. My name is Leslie Palmer, and I have personal knowledge of the facts articulated in this declaration. I swear under penalty of perjury, pursuant to 28 U.S.C. § 1746 that the following is true and accurate to the best of my knowledge.

Palmer's Qualifications and Familiarity with Employment Law

2. I graduated from Samford University's Cumberland School of Law in 2011 and was admitted to the Alabama State Bar that same year. While in law school, I was on the editorial board of the highest-ranking journal at Cumberland, the *Cumberland Law Review*, where I served as a research editor. I was also a member of the National Health Law Moot Court Team. I also served as an extern for the Honorable T. Michael Putnam, U.S. Magistrate Judge for the United States District

Court for the Northern District of Alabama, and as a Law and Public Policy Fellow for the Alabama Supreme Court, under the direction of Chief Justice Sue Bell Cobb and the Alabama Sentencing Commission.

3. Since receiving my bar license in 2011, I have been admitted to practice before the United States District Courts for the Northern and Middle and Southern Districts of Alabama and the Eleventh Circuit Court of Appeals.

4. I have focused my practice on plaintiff's employment litigation throughout most of the state for twelve years. The entirety of my legal career, my practice has been majority (over 90%) plaintiff's employment law.

5. I am a solo practitioner, I have owned and managed my own firm since 2011. I believe owning and managing my own firm has provided me experience beyond that of an attorney of the same number of years working as an associate within a larger firm. The risk factor of cases plays a larger consideration for a solo practitioner than an associate within a firm because the cost of the risk is directly passed to me and me alone.

6. I have been counsel in over 40 filed cases in federal courts in Alabama, with some of those being multi-plaintiff and represented charging parties on countless EEOC charges. I have tried six jury trials since 2011. Four were employment cases in Federal Court (including this one). I tried one case solo that was dismissed at Rule 50 motions. On two cases, I entered as assistant trial counsel just before trial and tried

them to verdict. This case marks my fourth employment law jury trial, and I acted as co-counsel sharing equally in duties and responsibilities. The remaining two cases were state court, non-employment cases, where I entered as assistant trial counsel.

7. I have filed several appeals before the Eleventh Circuit and argued before an Eleventh Circuit Panel in March of 2023 and October of 2023.

8. I have not engaged in any advertising and my practice runs 100% on referrals from other lawyers, including lawyers within the Alabama affiliate of the National Employment Lawyer's Association. I also regularly co-counsel with several experienced and reputable plaintiffs' employment attorneys.

9. I currently serve as Secretary/Treasurer on the board of the Alabama affiliate for the National Employment Lawyer's Association and am a regular member of the national organization where I attend annual conferences and targeted education related to employment litigation, including NELA's Trial Bootcamp. I am also a member of the Labor and Employment Section of the Alabama State Bar where I was elected to serve a seven-year board term in 2023, and am a member of the Federal Court Practice Section of the Alabama Bar.

10. I have published the following articles:

- a. *Words on the Page: A Mixed Understanding of the Meaning of "Because of Sex" within Title VII*, 48 Cumb. L. Rev. 497 (2017-2018).

11. I have guest lectured once annually at Cumberland School of Law's Technology in Law class since 2015 and added the same engagement to Birmingham School of Law in 2023. I have have spoken at the following CLE/Seminars:

- a. Cumberland School of Law Annual Employment Law Update – Dreadlocks and Beards and Tattoos – Oh My!, Discrimination in Grooming Policies, Hot Topics 2023 (Birmingham, Alabama, December 2023).
- b. Alabama State Bar Labor and Employment Law Section – E-Discovery (Orange Beach, Alabama, October 2023)
- c. National Employment Lawyer's Association – Defeating Summary Judgment in Harassment Cases (NELA National Fall Seminar, Atlanta Georgia, October 2023)
- d. Bessemer Bar Association – Employment Law Basics (Bessemer, Alabama, May 2023).
- e. National Employment Lawyer's Association (Alabama Affiliate) – Rule 26 Planning Meetings, Playing Chess Instead of Checkers (Birmingham, Alabama January 2023).
- f. Alabama State Bar Labor and Employment Law Section – Employee Speech in the Public and Private Sector (Orange Beach, Alabama, October 2022)

- g. National Employment Lawyer's Association (Alabama Affiliate) – Calculating Lost Wages, Benefits, and Interest (Birmingham, Alabama, January 2022)
- h. Alabama State Bar Labor and Employment Law Section – The Religious Freedom Restoration Act and Employment Discrimination (Orange Beach, Alabama, October 2021)
- i. National Employment Lawyer's Association (Alabama Affiliate) – LGBTQ+ Issues in the Workplace – What's Next? (Virtual - July 2020)
- j. Alabama State Bar Labor and Employment Law Section – LGBTQ Rights in the workplace – discussing Article *Words on the Page: A Mixed Understanding of the Meaning of "Because of Sex" within Title VII*, 48 Cumb. L. Rev. 497. (Orange Beach, Alabama, October 2018)

Reasonableness of Rate Requested

12. I am familiar with the attorneys' fee rates for labor and employment lawyers practicing in Alabama. I have assisted in working towards compiling orders for fee awards in an effort to create a database of attorney fee awards for use in fee petitions by NELA-AL members.

13. The current prevailing market rate in Alabama for plaintiffs' attorneys in employment litigation ranges from \$340 to \$650 per hour, depending on the skill and

experience of the litigator. I am aware of the high summary judgment rate in Alabama's District Courts for employment discrimination cases from my attendance at CLE's where the research of Atlanta Attorney Amanda Farahany was presented. This research showed the grant of summary judgment in employment cases exceeded 70%. The high risk of summary judgment, and the complexity of the legal issues, and the length of the average case make these cases undesirable to most members of the bar. The Alabama affiliate of the National Employment Lawyers' Association maintains a membership of less than 70. I would estimate fewer than 5-10 of those members have been practicing less than 10 years. I believe this number represents the undesirable nature and risk of these cases.

14. I have not had any occasion to be awarded fees by a court order in any other matter as of yet, but in 2020, I billed and was paid a rate of \$325 an hour on an hourly defense matter. Hourly payments in defense case tend to be lower than contingency cases because there is no risk involved. In February of 2023, in *Rodgers v. City of Warrior*, 2:22-cv-01305, in the Northern District of Alabama, I resolved an FLSA matter early in the litigation process without any complex or prolonged discovery and defense counsel on that case agreed in our Joint Motion for Settlement Approval that \$390 an hour was a reasonable rate for an attorney with my experience and skill. (Doc. 7 p.10). The Court (Northern District Magistrate Judge Danella)

approved the settlement finding the amount of fees reasonable. (Doc. 9 p.3-4). A copy of that motion and the court's order adopting it, is attached as Exhibit A.

15. In March of 2021, Attorneys from the law firm of Adams and Reese, LLP in Mobile filed a motion for fees in a Southern District Case, *Hornady v. Outokumpu Stainless USA*, 1:18-cv-00317 (Beaverstock) (Doc. 312) seeking fees of \$425 per hour for an attorney licensed since 2011, with at the time 10 years of practice. This fee was billed to and paid by the attorney's client as an hourly rate. The Court granted the motion without adjustment, noting that the defendant did not oppose the motion but instead agreed to pay the fees sought by the motion. (Doc. 317). The defendant's agreement to pay the hourly rate of \$425 per hour for an attorney with 10 years' experience is reflective of the prevailing market rate because it exhibits what a paying client would be (and was) willing to pay. A copy of that order and accompanying motion is attached as Exhibit B.

16. In January of 2022, United States District Court Judge Corey Maze awarded attorney Brian Noble, an attorney licensed for eleven years, a rate of \$340 per hour noting a 2.5% inflation adjustment annually. Judge Maze set the hourly rate for Brian Noble based on "opinion evidence" noting that no other evidence had been provided related to a reasonable rate for an attorney with his experience. In comparison, I have provided evidence of two rates I have successfully billed and have been noted as reasonable over the last three years. (See ¶ 14). I have also tried more

jury trials than Attorney Noble had at the time of the award. Additionally, the reasonable rate of a solo practitioner, bearing all of the risk, is higher than the rate of an associate at a firm. Solo practice brings higher risks and costs and requires the solo attorney to decline other work because there is no back-up counsel to assist on the other cases. Judge Maze's order in *Miles v. Wal-Mart Assoc., Inc.*, 4:19-cv-00756-CLM is attached as Exhibit C. The analysis of Mr. Noble's reasonable fee from a 2021 trial can be found at pages 10-11.

17. On July 1, 2021, Judge Corey Maze, United States District Court Judge for the Northern District of Alabama awarded Kira Fonteneau and Sonya Edwards an hourly rate of \$450 following a successful jury trial in Anniston, Alabama in December 2020. The case was *Barber v. TPC of Blount County Alabama, Inc.*, 4:18-cv-01633-CLM and the Order is attached as Exhibit D. Both Ms. Edwards and Ms. Fonteneau have been practicing since 2005, six years longer than me, mostly in solo practitioner roles. I believe a downward adjustment of \$50 reflects the 2.5% indicated as a reasonable annual adjustment by Judge Maze in the *Miles* noted in ¶ 16.

18. There are risks inherent in representing employees in employment discrimination. These cases require a high degree of analysis, significant research, writing, and discovery, and are often highly adversarial. The cases are handled on a contingency basis with no guarantee of compensation, years of spending time and resources without recovery, and often result in a loss, not only of our time, but of the

costs we invest in the case. Because our clients often come to us in a state of unemployment, they cannot afford retainers or flat-fees. The nature of these cases requires an attorney's willingness to accept them on a contingency hoping for significant compensation in the future. Additionally, given the risk of the unknown jury awards, attorneys often rely on the court's awards of reasonable fees to 1) adequately compensate them for the amount of work put into the case, 2) maintain the remedial purpose of the statutes, and 3) ensure adequate compensation of the plaintiff and carrying out of the jury's intention in the award.

19. These cases are often extremely adversarial with employers/defendants refusing to engage in any meaningful settlement discussions. The high rate of summary judgment awards and the statutory caps that often apply result in defendants/employers feeling little to no risk in moving forward with the full litigation. Additionally, it is not uncommon for a plaintiff's attorney to spend hours fighting for "standard" discovery, chasing down deposition dates, and responding to summary judgment briefs with obvious questions of fact. In my instance, all of this work is done by me. I am a true solo practitioner. I have no staff. The risk and nature of these cases requires that I be cognizant of my current caseload, future pipeline, future expenses, and risk of loss. I am not comfortable adding any staff to my firm without some level of certainty that I could meet payroll requirements of those individuals that would come to rely on me for support. This structure often requires

me to reach out to qualified co-counsel. Doing so requires an agreement to share in any recovery. If we are having to share a contingency fee percentage, without the later recovery of an adequate fee award, this results in recovery of a contingency fee less than that awarded obtained by state trial attorneys in simple bumper/fender bender cases. We are required to block of at least a week of our schedule if these cases proceed to trial, plus the time necessary for pre-trial filings and trial preparation. This requires again, stopping our incoming pipeline in advance to make certain we can adequately handle the number of cases we have moving at one time while we are necessarily away from the office. An award of reasonable/adequate rates is the only way to compensate attorneys in these matters fairly and ensure they continue representing these clients and serving this important public interest.

20. Because of the small number of attorneys willing to handle employment discrimination cases, the majority of us practice throughout the state. There are a very small number of plaintiffs' employment attorneys located in the Middle and Southern Districts with the majority of us practicing out of Birmingham, Alabama. Determining the relevant legal community cannot ignore low number of available counsel in the Montgomery area, the fact that this federal practice is state wide, and the likelihood that Plaintiff's will often have to seek counsel outside of the immediate vicinity of where the case is filed. Additionally, and importantly, in this particular case, after Yurie Yeoul Bae's withdraw from resending HEA, all of the counsel for every party

were located in Birmingham. Our client, Ms. Key attempted without success to locate an attorney in or around Montgomery. (Key Declaration Exhibit E). Because this area of practice is commonly statewide, the relevant legal community for consideration of reasonable rates includes some consideration of the statewide nature of the practice area and the need for attorneys from Birmingham to represent clients in other areas of the state to preserve the important public interest. Awarding significantly lower rates merely because of the location of the courthouse would result in further lack of desire to engage in representation of these matters. A Birmingham attorney would be more likely to accept only Birmingham cases further limiting the likelihood of plaintiffs in other locations finding competent and skilled counsel.

21. Considering the rate I have successfully billed and collected (up to \$390 without opposition), the award in the Southern District of \$425 for an attorney with 10 year's experience, the increased risk/cost/skill of running a solo practice, the risk necessary in this type of litigation, and my skills/experience/reputation, I am requesting \$400 per hour as a reasonable hourly rate.

Reasonableness of Time Sought

22. I have reviewed the hourly time sought for the preparation and trial of this case considering the factors outlined in *Norman v. Housing Authority of City of Montgomery*, 836 F.2d. 1292, 1300-1301 (11th Cir. 1988). These factors include (1) the time and labor required; (2) novelty and difficulty of the questions; (3) skill

requisite to perform the legal services properly; (4) preclusion of other employment by the attorney due to acceptance of the case; (5) customary fee for similar work in the community; (6) existence of a contingent-fee contract; (7) time limitations imposed by the client or the circumstances; (8) amount of damages and type of relief involved and the result obtained; (9) experience, reputation, and ability of the attorneys; (10) undesirability of the case; (11) nature and length of the professional relationship with the client; and (12) awards in similar cases. *Id.* At 1299-1200. The majority of these factors are discussed above with regard to the reasonable hourly rate. Additionally, in this particular case, it is important to note that the plaintiff had difficulty finding counsel. She was turned away by a number of attorneys. She filed her original claims pro-se and continued seeking counsel. (Key Declaration, Exhibit E). The nature of the claim, involving dreadlocks, made the case more complex than a standard race retaliation case. As noted by the continued arguments of all defendants, including Dynamic Security at trial, there was some instance that Eleventh Circuit precedent precluded Ms. Key's claim citing to *EEOC v. Catastrophe Management Solutions*, 852 F.3d 1018 (11th Cir. 2016). However, as this Court noted repeatedly in its findings, *Catastrophe Management* does not allow for grooming policies to stand as a proxy for race discrimination. This nuance plays to the time and labor, novelty and difficulty, skill, and desirability factors.

23. Considering these factors, the time sought is reasonable.

- a. Starting in 2022, I began using Lawcus, a practice management program with time tracking features that allows for manual entry and “start timer” functions. I am the only person entering information into this software. I was able to manually enter time I had been keeping by hand when I began using this software. This time does not include many of my phone conferences with the client. Because we are required to keep time contemporaneously, I can attest that this log misses some tasks that were not logged at the time they were completed. The software requires manual entry of e-mails. I did not log each e-mail as a separate time entry. I would lump e-mails together as .1 or .2 as I was reviewing the file. For clarity, I have also attached a spreadsheet of e-mails that I created through a data export around April 20th. This only contains received e-mails, not sent e-mails and does not include e-mails after April of 2023. This data export contains the date, subject and sender of the e-mails as a backup to my time report. Attached as Exhibit G is a report generated from within my software and the data export of the e-mail log.
- b. I have tried to be efficient and practical in determine what time to invest in the case. Ms. Leonard and I were intentional to not duplicate tasks unless a dual review was necessary, like a document that required both

signatures to be filed. Some of the tasks I would normally have to do without staff I was able to pass along to Ms. Leonard to delegate to her part time staff.

- c. My representation of Ms. Key began after she filed her pro se lawsuit. This required additional time to analyze all documents, filings, and rework the case under my theories. We immediately began working on amending the complaint and responding to multiple motions to dismiss.
- d. When responding to all of the dispositive motions, we attempted to avoid excess fees by compiling our responses to a single response instead of multiple responses. This was possible given the intertwined nature of all the claims and parties. We made this decision after considering the increased time we would accrue if we tried to separate our responses. This time would include additional time in drafting, preparing, and filing.
- e. Ms. Leonard and I shared costs on this case. The costs I personally accrued and am claiming in this case are \$2,101.59:
 - i. Deposition Transcripts: \$1613.63 (Dynamic 30(b)(6))
\$446.70 (Dynamic Unemployment)
\$5.00 (Unemployment Recording)
 - ii. Copies: \$35.25 (outsourced)

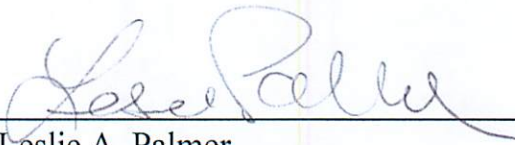
- iii. These costs do not include the transcript costs associated with the taking of HMMA's 30(b)(6) representative, which was not used at trial, and does not include any internal copy/print expenses for my firm.
- iv. The costs incurred by Palmer Law LLC are attached as Exhibit F.
- v. The remainder of the expenses/costs were carried by Heather Leonard.

24. I have tracked/logged a total of 425.1 hours on this case before filing this petition.

25. Given the intertwined nature and common nucleus of facts related to all of the claims in this case. The majority of the work on all claims was relevant and necessary to the work on the successful claim against Dynamic. In acknowledgment I have reduced my claim of hours by 10%, cutting 42.5 hours for a total claim of 382.6 hours at a rate of \$400 per hour or \$153,040 plus costs as included in the Bill of Costs.

26. I have reviewed the foregoing and declare under penalty of perjury that it is truthful and correct.

3-28-24
Date



Leslie A. Palmer

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	2:19-cv-767-ECM-SMD
)	
DYNAMIC SECURITY, INC.,)	
Defendant.)	

**Exhibit A to
Declaration of Leslie Palmer in Support of
Petition for the Award of Attorneys' Fees and Expenses**

Rodgers v. City of Warrior, 2:22-cv-01305-NAD,

Doc. 7, Joint Motion for Settlement Approval and Incorporated Settlement Agreement (See ¶ 18 RE: Reasonableness of Rate).

Doc. 9, Order Granting Joint Motion for Approval of Settlement Agreement

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

JIMMY RODGERS,)	
)	
PLAINTIFF,)	
)	
v.)	CASE ACTION NO:
)	2:22-cv-01305-NAD
CITY OF WARRIOR,)	
)	
DEFENDANT.)	

**JOINT MOTION FOR SETTLEMENT APPROVAL AND
INCORPORATED SETTLEMENT AGREEMENT**

COMES NOW, the Plaintiff, Jimmy Rodgers, and the Defendant, the City of Warrior, herein after the “parties”, and jointly move this Court to approve the Parties’ Settlement Agreement, which represents a resolution of a disputed matter under the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.* (“FLSA”).

In support of this Motion, the parties state as follows:

INTRODUCTION

1. Plaintiff initiated this action against Defendant, alleging that on the end of his employment, Defendant failed to pay Plaintiff earned compensatory time accrued during for hours worked in excess of 86 hours bi-weekly and otherwise failed to properly calculated overtime compensation. (Doc. 1).

2. Plaintiff believes that this cause of action, allegations, and contentions asserted in this action have merit and that the evidence developed to date supports the cause of action asserted. Defendant disputes Plaintiff's claims and asserts various defenses to Plaintiff's claims, including, but not limited to, that it did not fail to pay overtime, that Plaintiff did not accrue compensatory time, that any failure would have occurred in good faith, and that Plaintiff did not bring any claims within the applicable statute of limitations.
3. Accordingly, the Parties have reached a Settlement Agreement to resolve the Plaintiff's claims for unpaid compensatory time and overtime wages. The Agreement is set forth below at pages @@-@@. Pursuant to applicable Eleventh Circuit precedent, this Court is empowered to review and approve the provisions of such settlement agreements in actions brought for back wages under the FLSA. *See Lynn's Food Stores v. United States*, 679 F.2d 1350 (11th Cir. 1982). Because the Parties have agreed that the terms reflected in this Agreement are mutually satisfactory and that they represent a fair and reasonable resolution of a bona fide dispute, the Parties respectfully request that the Court approve the Settlement Agreement.
4. In support of this request that the Court approve the Parties' Settlement Agreement, Plaintiff submits that he is satisfied that he will be fairly

compensated under the terms of the Settlement agreement for the alleged unpaid compensatory time wages and overtime premium to which he claims to be entitled. Additionally, Plaintiff's counsel represents that: (a) Plaintiff fully understands the Agreement and (b) Plaintiff has consulted with counsel before agreement to the Agreement and has entered into it knowingly and voluntarily.

WHEREFORE, the Parties respectfully request that this Court approve the Settlement Agreement as a fair and reasonable compromise of disputed issues under the FLSA.

MEMORANDUM OF LAW

5. Employees can settle and release claims under the FLSA in two ways. First, employees can settle and waive their claims under the FLSA if the Secretary of Labor supervises the payment of unpaid wages by the employer to the employee. *See* 29 U.S.C. § 216(c) (2008); *Lynn's Food Stores*, 679 F.2d at 1353. Second, in the context of a private lawsuit brought by an employee against an employer under the FLSA (as is the case here), an employee may settle and release FLSA claims if the parties present the district court with a proposed settlement, and the district court enters a stipulated judgment approving the fairness of the settlement. *Id.*; *see also D.A. Schulte, Inc. v. Gangi*, 328 U.S. 108, 113 n.8 (1946) (discussing the propriety of allowing

settlement of FLSA claims where the district court has reviewed the terms of the settlement agreement).

6. In detailing the circumstances justifying court approval of an FLSA settlement in the litigation context, the Eleventh Circuit has stated as follows:

Settlements may be permissible in the context of a suit brought by employees under the FLSA for back wages because initiation of the action by the employees provides some assurance of an adversarial context. The employees are likely to be represented by an attorney who can protect their rights under the statute. Thus, when the parties submit a settlement to the court for approval, the settlement is more likely to reflect a reasonable compromise of disputed issues than a mere waiver of statutory rights brought by an employer's overreaching. If a settlement in an employee FLSA suit does reflect a reasonable compromise over issues, such as FLSA coverage or computation of back wages that are actually in dispute, we allow the district court to approve the settlement in order to promote the policy of encouraging settlement of litigation.

Lynn's Foods, 679 F.2d at 1354.

7. In the instant action, the Court should approve the Parties' Settlement Agreement to resolve Plaintiff's claims for wages against Defendant. The proposed Settlement Agreement arises out of an action that was adversarial in nature. The parties disputed the merits of the case, with Plaintiff contending that Defendant violated the FLSA by failing to pay his compensatory time earned and otherwise failing to appropriately calculate and pay his overtime premium. Defendant disputes Plaintiff's claims and

Defendant disputes Plaintiff's calculation of wages owed (even if liability were to be found) and further contends that if any failure to pay overtime occurred, the error occurred in good faith. Defendant states that it did not fail to pay overtime, that Plaintiff did not accrue compensatory time, that any failure would have occurred in good faith, and that Plaintiff did not bring any claims within the applicable statute of limitations. During the litigation and settlement of this action, both parties were represented by competent and experienced attorneys who are well versed in this area of the law.

Plaintiff and his counsel discussed the claims and the parties formulated their own proposed settlement figures. Defendant provided pay records/history for Plaintiff, allowing Plaintiff to conduct a reasonable analysis of the claims and support for his damages. The Parties engaged in a full day mediation conducted by Thomas Woodall.

8. The Parties entered into this settlement in recognition of the risks inherent in any litigation – specifically, for the Plaintiff, the risk of no recover or recover that is less than the one obtained through this proposed agreement, and for the Defendant, the expense and uncertainty of further litigation and the risk of a verdict against it on some or all of the merits.

The Settlement agreement provides Plaintiff (1) a full recovery of the accrued compensatory time allowed under the statute (480 hours); (2) a

payment of attorney's fees and costs to Plaintiff's counsel for prosecuting this matter.

9. Because the Settlement Agreement represents a fair and reasonable resolution over a bona fide wage dispute and was negotiated at arms' length, the Court should approve this settlement.

SETTLEMENT AGREEMENT

Plaintiff's Statement of Claims

10. This action is brought pursuant to the FLSA, 29, U.S.C. § 201 *et seq.* for equitable and declaratory relief and to remedy violations of the FLSA by Defendant, which has deprived Plaintiff of his lawful compensatory time wages and/or overtime premium in regard to every hour worked in excess of 86 hours bi-weekly. This action was brought to recover unpaid but earned compensatory time hours and miscalculated and unpaid overtime hours.
11. Plaintiff estimated his damages for unpaid compensatory time (capped at 480 hours) and unpaid overtime in the amount of 192 hours (the difference between the capped compensatory time hours and his logged compensatory time hours). Plaintiff alleges the relevant statutory period is three years.

Defendant's Statement of Defenses

12. Defendant denies Plaintiff earned compensatory time and alleges it paid Plaintiff all earned overtime wages at the time they were earned/due.

Defendant further asserts the relevant statutory period is two years from the date Plaintiff's employment ended making any and all claims time-barred.

Finally, Defendant asserts that even if there was a violation, or if there were wages owed, any such violation occurred in good faith and was not willful.

Settlement Terms

13. In an effort to resolve the lawsuit, Defendant produced paycheck history/log for Plaintiff to aid Plaintiff in his evaluation of his claim and Defendant's defenses.

14. The parties recognize that gathering additional records and testimonial evidence during the alleged liability period and determining whether the Defendant failed to pay overtime premiums/compensatory time and operated in "good faith" would significantly increase litigation costs and potentially jeopardize the settlement amount and delay payment of the settlement. These disputes would likely remain unresolved, require summary judgment filings, and the Court having to expend resources regarding liability and the Defendant's contentions that it acted in good faith.

15. The applicable statute sets a cap on allowable accrued compensatory time. Any more thorough review of time records would require extensive discovery and calculation. Through mediation, the Parties discussed their strengths and weaknesses of their responsive positions. Notably, the Parties

recognized the inherent risks with continued litigation. Plaintiff believes the amount he will receive pursuant to this settlement reflects a fair and reasonable compromise of unpaid compensatory time accrued if he were to prevail on his FLSA claim at trial. Plaintiff acknowledges there is a legitimate dispute as to the willfulness and relevant statutory time period. While still denying liability, Defendant believes the amount Plaintiff will receive pursuant to this settlement reflects an amount well in excess of complete and total satisfaction for any unpaid overtime/compensatory time wages or liquidated damages Plaintiff could expect to recover if he were to prevail on his FLSA claims at trial.

16. Plaintiff's attorney's fees were negotiated at arm's length only after the Plaintiff and Defendant arrived at an agreement regarding the Plaintiff's unpaid overtime/compensatory time wages. Defendant agrees that a sum of \$7,000 for attorney's fees and \$402 for the reimbursement of the filing fee is fair and reasonable. As courts have recognized, in circumstances like the instant matter, a lodestar analysis is not always required. *See Crabtree v. Volkert, Inc.*, 2013 WL 593500, at *7 n.4 (S.D. Ala. Feb. 14, 2013) (“[P]ersuasive district court authority has deemed scrutiny of the reasonableness of plaintiffs agreed-upon attorney's fees to be unnecessary in an FLSA settlement where ‘the plaintiffs attorneys’ fee was agreed upon

separately and without regard to the amount paid to the plaintiff,’ except in circumstances where ‘the settlement does not appear reasonable on its face or there is reason to belief that the plaintiffs’ recovery was adversely affected by the amount of fees paid to his attorney.’”) (quoting *Bonetti v. Embarq Management Co.*, 715 F.Supp. 2d 1222, 1228 (M.D. Fla. 2009); and citing also *Wing v. Plann B Corp.*, 2012 WL 4746258, *4 (M.D. Fla. Sept. 17, 2012) (declining to examine reasonableness of attorney’s fee payment in FLSA settlement where the FLSA claims were compromised, there was a reasonable basis for such compromise, and “Plaintiffs claims were resolved separately and apart from the issue of attorneys’ fees,” such that “there is no reason to believe that Plaintiffs recover was adversely affected by the amount of fees and costs to be paid to Plaintiff’s counsel”)).

17. The method of calculation used in determining the above amounts is reasonable and does not compromise or diminish Plaintiff’s recovery, nor did it undermine the broad remedial purpose of the FLSA. It provides Plaintiff with a fair and reasonable compromise of his disputed claim for compensatory time/overtime premium wages.

18. Plaintiff agrees that \$7,000 should be paid to his attorney in light of the favorable negotiation and \$402 for the recovery of the filing fee. Plaintiff’s counsel expended time reviewing Plaintiff’s documentation, drafting the

complaint, researching the novel issue of compensatory time damages, negotiating with Defendant, drafting a mediation statement, and mediating these claims. Defendant has agreed that this amount be award to Plaintiff's counsel. Defendant's counsel does not dispute that Plaintiff's counsel's hourly rate of \$390.00 per hour is reasonable. Defendant agreed to pay this amount in light of the costs, work performed, hours spent, likely hourly rates awardable, and in an effort to expedite payment to Plaintiff and to avoid costs and delay associated with continued litigation and fee petition.

19. Plaintiff will receive a check in the amount of \$12,000 for which a 1099-MISC will issue.

20. Plaintiff understands and agrees that he is responsible for the tax implications of the payment rendered to him but he does not agree to indemnify or hold harmless Defendant for any taxes, fees, or penalties which may accrue.

21. Neither party nor counsel has made any representation concerning any taxes or tax implications and has not provided any tax advice or any advice related to the effect of this payment on any public or private benefit policy including any disability, retirement, pension, or similar.

22. Defendant will issue a check to Palmer Law, LLC in the amount of \$7,402 for which a 1099-Misc will issue.

23. Defendant shall render all payments described herein to Plaintiff's counsel within 14 days of the Court's approval of the above settlement and entry of a final order of dismissal with prejudice. Upon such payment, Plaintiff shall release Defendants from any and all known and unknown wage-and-hour compensation claims arising out of the facts and circumstances of this litigation, whether under local, state, or federal law, including but not limited to those claims and allegations included in this litigation.

24. The Parties represent that they have reached a reasonable and fair resolution of Plaintiff's FLSA claims. The Parties represent that they engaged in a good faith, arm's length negotiation in an effort to resolve the matter. The record indicates that a bona fide dispute existed regarding any errors and omission to Defendant's compensation of Plaintiff for overtime and/or compensatory time occurring in good faith.

25. Plaintiff and Defendant agree that Defendant entering into this Agreement is not intended to be and shall not be construed to be an admission of any liability in this or any other similar matters.

26. A Proposed Stipulated Judgment, Approval of Settlement and Order of Dismissal is attached as Exhibit A.

CONCLUSION

27. All parties have reached settlement as to all issues and claims, including the issue of attorney's fees. Undersigned counsel for Plaintiff affirms to the Court that she has attorney from her client and from Defendant to submit the above settlement agreement resolving this dispute on these specific terms and that there are no other terms that have not been stated. The Settlement is contingent on this Court's approval.

THIS WILL CERTIFY THAT ALL PARTIES HAVE AGREED TO THE ABOVE. FURTHER, THE PARTIES HAVE AGREED THAT LESLIE PALMER WILL E-FILE THE FOREGOING JOINT MOTION FOR SETTLEMENT APPROVAL AND INCORPORATED SETTLEMENT AGREEMENT.

Respectfully submitted, this 24th day of February, 2023.

/s/ Leslie A. Palmer
Leslie A. Palmer,
Attorney for Plaintiff

OF COUNSEL:
PALMER LAW, LLC
104 23rd Street South, Suite 100
Birmingham, Alabama 35233
(205) 285-3050
leslie@palmerlegalservices.com

/s/ James S. Ward
James S. Ward,
Attorney for Defendant

(with permission)

OF COUNSEL:
WARD & COOPER, LLC
2100A Southbridge Pky, Ste 645
Birmingham, AL 35209
(205) 871-5404
jward@wardcooperlaw.com

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

JIMMY RODGERS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:22-cv-01305-NAD
)	
CITY OF WARRIOR,)	
)	
Defendant.)	

**ORDER GRANTING JOINT MOTION FOR
APPROVAL OF SETTLEMENT AGREEMENT**

For the reasons stated below, the court **GRANTS** the parties’ “Joint Motion For Settlement Approval And Incorporated Settlement Agreement.” Doc. 7.

BACKGROUND

Plaintiff Jimmy Rodgers filed a complaint against Defendant City of Warrior alleging violations of the Fair Labor Standards Act (FLSA), 29 U.S.C. § 201 et seq. Doc. 1.

Plaintiff Rodgers alleges that the Defendant City used compensatory time in lieu of overtime pay as allowable under the FLSA, but that Rodgers accrued “289 hours in excess of the time allowed under 29 U.S.C. § 207(o).” Doc. 1 at 3. Rodgers alleges that the City did not compensate him at the overtime rate required for these excess hours, and failed to pay him this time upon his resignation. Doc. 1 at 3.

Rodgers alleges two claims for FLSA violations, one related to overtime pay

and one related to compensatory time. Doc. 1 at 4–5.

The parties negotiated a settlement of Rodgers’ claims and now move for approval of the settlement agreement, and approval of attorney’s fees and costs. Doc. 7. The parties consented to magistrate judge jurisdiction. Doc. 8.

LEGAL STANDARD

When an employee files suit under the FLSA and presents the court with a proposed settlement, the court “may enter a stipulated judgment after scrutinizing the settlement for fairness.” *Lynn’s Food Stores, Inc. v. United States Dep’t of Labor*, 679 F.2d 1350, 1353 (11th Cir. 1982). The court must certify that the settlement is “a fair and reasonable resolution of a bona fide dispute over FLSA provisions.” *Id.* at 1355.

DISCUSSION

The court approves the parties’ settlement agreement, and the request for attorney’s fees and costs.

Based on an examination of the pleadings and terms of the settlement agreement in this case, the court finds that a bona fide dispute of both law and fact is involved in this litigation, including but not limited to issues of liability regarding overtime pay and compensatory time. *See Lynn’s Food*, 679 F.2d at 1355. The settlement provides that Rodgers will “receive a check in the amount of \$12,000 for which a 1099-MISC will issue.” Doc. 7 at 10. In exchange, the settlement

agreement provides that Rodgers “shall release Defendant[] from any and all known and unknown wage-and-hour compensation claims arising out of the facts and circumstances of this litigation, whether under local, state, or federal law, including but not limited to those claims and allegations included in this litigation.” Doc. 7 at 11.

The court finds that the settlement terms to which the parties have agreed are fair and equitable to all involved, and the court *certifies* that the parties’ agreement is a fair and reasonable resolution of this bona fide dispute. *See Lynn’s Food*, 679 F.2d at 1353. The court finds further that the release in this case is appropriate because it does not “use an FLSA claim (a matter arising from the employer’s failing to comply with the FLSA) to leverage a release from liability unconnected to the FLSA.” *Moreno v. Regions Bank*, 729 F. Supp. 2d 1346, 1351 (M.D. Fla. 2010).

In addition, the court approves the reasonableness of the award of legal fees in the parties’ settlement agreement. The “FLSA requires judicial review of the reasonableness of counsel’s legal fees to assure both that counsel is compensated adequately and that no conflict of interest taints the amount the wronged employee recovers under a settlement agreement.” *Silva v. Miller*, 307 F. App’x 349, 351 (11th Cir. 2009) (citing *Lynn’s Food*, 679 F.2d at 1352). Here, Defendant does not oppose an award of attorney’s fees of \$7,000 and the recovery of \$402 in costs for the filing fee (i.e., a total of \$7,402). Doc. 7 at 9–10. The court finds that the requested amount

of attorney's fees and costs is fair and reasonable and does not represent a conflict of interest.

* * *


Accordingly, the parties' joint motion for settlement approval (Doc. 7) is **GRANTED**.

CONCLUSION

For the reasons stated above, the court **ORDERS** as follows:

1. The parties' settlement agreement is approved, its terms are fair, reasonable, and adequate, and the parties are directed to consummate the terms and provisions of the settlement agreement;
2. Plaintiff's request for attorney's fees and costs, as stated in the settlement agreement, is approved.

DONE and **ORDERED** this March 7, 2023.



NICHOLAS A. DANELLA
UNITED STATES MAGISTRATE JUDGE

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	2:19-cv-767-ECM-SMD
)	
DYNAMIC SECURITY, INC.,)	
Defendant.)	

**Exhibit B to
Declaration of Leslie Palmer in Support of
Petition for the Award of Attorneys' Fees and Expenses**

Hornady v. Outokumpu Stainless USA,

Doc. 312, ADP's Motion for Attorneys' Fees and Cost (See p.6 for requested rates).

Doc. 312-1, Declaration of Matthew R. Jackson (See ¶ 2-4 RE: length of practice).

Doc. 317, Order

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

WILLIAM HEATH HORNADY, et al.,

*

*

Plaintiffs,

*

*

v.

*

Case No. 1:18-cv-00317

*

OUTOKUMPU STAINLESS USA,

*

*

Defendant.

*

ADP, INC.’S MOTION FOR ATTORNEYS’ FEES AND COSTS

ADP, Inc. respectfully moves this Court for an Order awarding ADP its reasonable attorneys’ fees and costs against the Defendant and/or its counsel (“Defense Counsel”) related to ADP’s expenses incurred in this matter due to Defense Counsel’s misrepresentations to the Court.¹

INTRODUCTION

In the summer of 2020, Defense Counsel issued a subpoena seeking documents from ADP, which was Defense Counsel’s current client in other matters. Although ADP produced responsive documents just five business days later, Defense Counsel never produced those documents to Plaintiffs. And to hide that fact when faced with sanctions motions, Defense Counsel threw their client, ADP, under the bus by misrepresenting to the Court (both verbally and in writing) that ADP had never responded to the subpoena. These misrepresentations led the Court to believe that ADP never “bothered to respond at all” to the subpoena.² Consequently, this Court entered a show-cause order requiring ADP to appear in court to explain itself.

¹ At the second show-cause hearing on March 12, 2021, the Court directed ADP to file this motion. (Doc. 303, PageID #: 3936, Tr. 46:8-11).

² (Doc. 299, PageID #: 3709, Tr. 15:12-13).

Although the Court ordered Defense Counsel to timely serve the first show-cause order on ADP, they did not do that. Instead, they let almost two weeks pass without even mentioning the show-cause order or the hearing. Because Defense Counsel waited until the last minute to inform ADP about the hearing, ADP was unable to attend in person, which caused the Court more frustration and resulted in a second show-cause order that set a second hearing.

Because ADP had promptly responded to the subpoena, ADP was puzzled as to why it was being ordered to appear in court for what the Court deemed to be noncompliance. ADP retained counsel to investigate what had happened, present the findings to the Court, and defend ADP against sanctions at the second show-cause hearing.

ADP was shocked to learn that its own attorneys at Littler Mendelson had made repeated material misrepresentations about their own client, ADP, subjecting it to potential contempt sanctions. On March 11, 2021, ADP filed a brief advising the Court what had happened, and on March 12, 2021, ADP appeared in person and with counsel at the second show-cause hearing. At the hearing, the Court's questioning made clear that the Defendant repeatedly failed to produce basic information in discovery, represented that ADP had the information, and then falsely represented that ADP had never responded to the subpoena.

Defense Counsel's misrepresentations resulted in ADP having to retain counsel to investigate this matter on an expedited and emergency basis and defend ADP against contempt sanctions, and they also caused ADP to involve numerous employees and have a company representative travel from New Jersey to Alabama to attend the second show-cause hearing. The only reason ADP has suffered this significant burden and expense is because of Defense Counsel's misrepresentations. (Doc. 303, PageID #: 3909, Tr. 19:19-22; 19:14-22; PageID #: 3939, Tr. 49:13-22; PageID #: 3936-37, Tr. 46:24-47:1).

Defense Counsel's misrepresentations also caused ADP to have to perform subsequent document production projects within very short windows of time, which required the assistance of outside counsel and paralegals.

This is not Defense Counsel's first rodeo when it comes to discovery misconduct in this District. In a previous case before Judge Steele – which he characterized as “litigation overkill” and a “case [that] went horribly wrong” – Defense Counsel was personally sanctioned twice for withholding documents, causing inexcusable delay, and repeatedly thwarting a plaintiff's discovery efforts. *White v. Thyssenkrupp Steel USA, LLC*, Civil Action No. 09-286-WS-N at Docs. 38 and 60.³ Here, this Court should sanction the Defendant and their counsel due to their misrepresentations and to prevent the unjust consequence of ADP having to incur these unnecessary costs.

ARGUMENT

This Court has the authority to enter this award under Rules 11, 37, and 45,⁴ the Court's inherent authority, 28 U.S.C. § 1927, and/or any other grounds upon which this Court chooses to

³ (Doc. 38, PageID #: 314) (“The protestations of defendant's counsel about their willingness to cooperate with plaintiff” to schedule depositions were “not supported by the record.”); *id.* at PageID #: 325 (“Even a cursory review of the record reveals a pattern on the part of defendant's counsel to thwart every effort of plaintiff's counsel to schedule the depositions critical to plaintiff's case ...”); *id.* at PageID #: 326 (“The conduct of defendant's counsel, as established by the numerous emails and other communications attached to the parties briefs, clearly prevented plaintiff from completing her depositions in a timely fashion, already necessitated one continuance of the discovery deadline in this case without permitting the completion of a single firstround deposition, will no doubt necessitate a further continuance to complete the discovery likely to be required by the testimony of defendant's aforementioned employees and representative and, despite the contentions of defendant's counsel to the contrary, without question necessitated plaintiff's motion to compel.”); (Doc. 60, PageID #: 603) (“The undersigned must first observe that the attempt of defendant's counsel to divert responsibility for missing and withheld documents to their clients is problematic.”).

⁴ *Fed. R. Civ. P.* 11 (applicable to Defense Counsel's misrepresentations in briefs); *Fed. R. Civ. P.* 45(d)(1) (authorizing sanctions against “a party or attorney” who fails to “take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena”).

do so. As of today, ADP has incurred a total of \$63,668.02 in expenses related to the two show-cause orders and subsequent related work. Those expenses include \$60,754.50 in attorneys' fees and paralegal fees and \$2,913.52 in costs. In support of this motion, ADP submits:

1. Declaration of Matthew R. Jackson, with attached itemization of time;
2. Declaration of Matt McDonald concerning reasonable attorneys' fees rates; and
3. Declaration of R. Scott Hetrick concerning reasonable attorneys' fees rates.

I. Reasonable Attorneys' Fees

Generally, "[t]he starting point for calculating a reasonable attorney's fee is "the number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate" for the attorney's services. *Norman v. Housing Authority of the City of Montgomery*, 836 F.2d 1292, 1299 (11th Cir. 1988). To make this determination, the district court should consider the relevant factors among the twelve identified in *Johnson v. Georgia Highway Express, Inc.*, which are:

- (1) the time and labor required;
- (2) the novelty and difficulty of the questions;
- (3) the skill requisite to perform the legal service properly;
- (4) the preclusion of other employment caused by accepting the case;
- (5) the customary fee;
- (6) whether the fee is fixed or contingent;
- (7) time limitations imposed by the client or circumstances;
- (8) the amount involved and the results obtained;
- (9) the attorney's experience, reputation, and ability;
- (10) the undesirability of the action;
- (11) the nature and length of the relationship between the attorney and client; and

(12) awards in similar cases.

Bivins v. Wrap It Up, Inc., 548 F.3d 1348, 1350 (11th Cir. 2008) (citing *Johnson*, 488 F.2d 714, 717–719 (5th Cir. 1974)). The product of these two numbers is referred to as the “lodestar,” and there is a strong presumption that the lodestar represents a reasonable fee. *Perdue v. Kenny A. ex rel. Winn*, 559 U.S. 542, 552 (2010).

After calculating the lodestar, “[t]he court may then adjust the lodestar to reach a more appropriate attorney's fee, based on a variety of factors.” *Assoc. of Disabled Americans v. Neptune Designs, Inc.*, 469 F.3d 1357, 1359 n.1 (11th Cir. 2006).⁵ The lodestar may be enhanced “in those rare circumstances in which the lodestar does not adequately take into account a factor that may properly be considered in determining a reasonable fee.” *Perdue*, 559 U.S. at 554 (citations omitted). The fee applicant must produce evidence that the “enhancement was necessary to provide fair and reasonable compensation.” *Id.* at 553 (citations omitted).

a. Reasonable Rate

The reasonable hourly rate is generally “the prevailing market rate in the legal community for similar services by lawyers of reasonably comparable skills, experience, and reputation.” *Blum v. Stenson*, 465 U.S. 886, 895–896 n. 11 (1984); *Norman*, 836 F.2d at 1299. The “relevant market” is the “place where the case is filed.” *American Civil Liberties Union of Ga. v. Barnes*, 168 F.3d 423, 437 (11th Cir. 1999) (citation and internal quotation marks omitted).

⁵ Although the “*Johnson* factors are to be considered in determining the lodestar figure; they should not be reconsidered in making either an upward or downward adjustment to the lodestar — doing so amounts to double-counting.” *Bivins*, 548 F.3d at 1349 (citing *Burlington v. Dague*, 505 U.S. 557, 562–563 (1992)); *Perdue*, 559 U.S. at 553 (“an enhancement may not be awarded based on a factor that is subsumed in the lodestar calculation.”); *Barnes v. Zaccari*, 592 F. App'x 859, 871 (11th Cir. 2015) (citing *Bivins*, 548 F.3d at 1349).

“Put simply, the reasonable hourly rate is the rate a paying client would be willing to pay.” *Lavatec Laundry Tech. GmbH v. Voss Laundry Sols.*, No. 3:13-CV-00056, 2018 WL 2426655, at *15 (D. Conn. Jan. 9, 2018) (quotations omitted). When “a sophisticated client pays attorneys’ fees that it does not know it will necessarily recover, the rate paid is presumptively reasonable.” *Id.* (citations omitted); see *Stonebrae, L.P. v. Toll Bros.*, No. C-08-0221-EMC, 2011 WL 1334444, at *6 (N.D. Cal. Apr. 7, 2011), *aff’d*, 521 F. App’x 592 (9th Cir. 2013).⁶

In the present case, ADP has agreed to pay their counsel and paralegals the following hourly rates:

Matt Jackson	Partner	\$425.00
Garrett Zoghby	Associate	\$315.00
Blake Richardson	Associate	\$315.00
Becky Gibson	Paralegal	\$220.00
Joy Massey	Paralegal	\$220.00
Leigh Lods	Paralegal	\$220.00

ADP’s counsel will invoice ADP for the hours worked at these hourly rates, and ADP has agreed to pay those amounts. Because ADP – a sophisticated client – has agreed to pay these hourly rates and will pay them, they are presumed reasonable.

Moreover, the *Johnson* factors weigh in favor of these rates. ADP’s counsel accepted this case just hours before the first show-cause hearing, at which it appeared ADP would likely be sanctioned.⁷ When the second show-cause order was entered setting a second show-cause hearing

⁶ See also *Crescent Publ’g Grp. v. Playboy Enters.*, 246 F.3d 142, 144 (2d Cir. 2001) (“[A]ny evidence of the actual billing arrangement between [the party seeking fees] and its counsel should be considered a significant, though not necessarily controlling, factor in the determination of what fee is ‘reasonable’”).

⁷ Under these circumstances, the action was “undesirable” within the meaning of the tenth *Johnson* factor.

in just one week, sanctions appeared even more likely,⁸ so ADP’s counsel worked tirelessly over the weekend and all week to investigate the matter⁹ and present the findings to the court, and then represent ADP at the second show-cause hearing. During this time, ADP’s lead counsel worked almost exclusively on this case due to its importance, emergency and time-sensitive nature, the apparent likelihood of sanctions, and the severity of potential adverse consequences.¹⁰ This took an extraordinary amount of time and effort within a very short timeframe and under extreme pressure, and it was complicated and required extraordinary skill.¹¹ Even so, ADP’s counsel’s efforts fully exonerated ADP and shined a spotlight on Defense Counsel’s misrepresentations, which would have gone undetected without the undersigned’s efforts.¹² This excellent result may also warrant an upward adjustment to the lodestar. *Norman*, 836 F.2d at 1302 (“If the results obtained were exceptional, then some enhancement of the lodestar might be called for.”) (citation omitted).

Under these circumstances, the hourly rates being charged by ADP’s counsel should be considered reasonable.

⁸ (Doc. 298) (stating, in the very sentence, that ADP had “violated this Court’s February 19, 2021 order to appear ... to show cause for its failure to comply with a subpoena.”).

⁹ Among other things, the undersigned’s investigation included reviewing the filings (which, at that time, were almost 300 docket entries) and hearing transcripts in this case, having discussions with counsel, reviewing their correspondence, and reviewing correspondence between ADP and Defense Counsel.

¹⁰ *Johnson* factor four (preclusion of other employment caused by accepting the case).

¹¹ *Johnson* factors one (time and labor required), two (the novelty and difficulty of the questions), three (the skill requisite to perform the legal service properly), and seven (time limitations imposed by the client or circumstances).

¹² *Johnson* factor eight (what’s at stake and the results obtained). Although this paragraph does not address *Johnson* factor five, six, nine, eleven, or twelve, those factors are addressed in the supporting declarations and are met as well.

b. *Hours Reasonably Expended*

After determining the reasonable rates, courts then determine the hours reasonably expended. *Nat'l Comm'n for Certification of Crane Operators, Inc. v. Nationwide Equip. Training, LLC*, No. CV 17-0152-CG-M, 2021 WL 149846, at *2–3 (S.D. Ala. Jan. 15, 2021). Counsel “should make a good faith effort to exclude from a fee request hours that are excessive, redundant or otherwise unnecessary.” *Hensley v. Eckerhart*, 461 U.S. 424, 434 (1983). A district court should not allow any hours “that would be unreasonable to bill to a client and therefore to one's adversary irrespective of the skill, reputation or experience of counsel.” *Norman*, 836 F.2d at 1301 (emphasis omitted). “To determine the hours reasonably expended, the Court may consider the first and second *Johnson* factors: the time and labor required and the novelty and difficulty of the question.” *Nat'l Comm'n for Certification of Crane Operators, Inc.*, 2021 WL 149846, at *3.

In the present case, as of today, the following attorneys and paralegals expended the following hours on legal tasks benefitting ADP in this matter:

Matt Jackson	Partner	102.4
Garrett Zoghby	Associate	24.3
Blake Richardson	Associate	0.8
Becky Gibson	Paralegal	17.3
Joy Massey	Paralegal	14.8
Leigh Lods	Paralegal	10.3
TOTAL		169.9

Attached hereto are the undersigned detailed billing records that demonstrate exactly what work was being performed. As reflected within those records and the attached declarations, the work performed was not excessive, redundant, or otherwise unnecessary. Consequently, the Court should find these hours were reasonably expended in this matter.

c. Lodestar Calculation

Based on the foregoing, ADP requests reasonable attorneys' fees in the amount of **\$60,754.50**, based on the following calculation:

Name	Title	Rate	Hours	Award
Matt Jackson	Partner	\$425	102.4	\$43,520.00
Garrett Zoghby	Associate	\$315	24.3	\$7,654.50
Blake Richardson	Associate	\$315	0.8	\$252.00
Becky Gibson	Paralegal	\$220	17.3	\$3,806.00
Joy Massey	Paralegal	\$220	14.8	\$3,256.00
Leigh Lods	Paralegal	\$220	10.3	\$2,266.00
TOTAL				\$60,754.50

II. Other Expenses

ADP also seeks an additional \$2,913.52 in costs, which are based on the following calculation and are supported by the attached declarations and billing records:

Cost	Amount
Transcript Fees	\$890.87
ADP Travel/Lodging	\$813.68
Overtime Pay	\$1,208.97
TOTAL	\$2,913.52

In total, ADP seeks an award of its reasonable attorneys' fees and costs in the amount **\$63,668.02**.

Since ADP is still performing work on this matter, ADP reserves the right to petition the Court to award additional expenses related thereto.

Respectfully submitted,

/s/ **Matthew R. Jackson**

MATTHEW R. JACKSON (JACKM7882)

GARRETT ZOGHBY (ZOGHG7748)

Attorneys for ADP, Inc.

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

WILLIAM HEATH HORNADY, et al.,

Plaintiffs,

v.

OUTOKUMPU STAINLESS USA,

Defendant.

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*
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Case No. 1:18-cv-00317

DECLARATION OF MATTHEW R. JACKSON

Pursuant to 28 U.S.C. § 1746, I hereby declare the following:

1. My name is Matthew R. Jackson. I am over the age of 19 years, am fully competent to testify to and have personal knowledge of the matters set forth herein.

2. I am an attorney licensed to practice law in Alabama. I was admitted to the Alabama State Bar in 2011 and have been consistently licensed to practice in Alabama since then. Before I was admitted in Alabama, in 2010, I became licensed to practice law in Tennessee, where I have been consistently licensed ever since.

3. I am employed as an attorney at Adams and Reese LLP and am a Partner in the firm's Mobile, Alabama office.

4. I have been admitted to practice before the United States District Court for the Southern District of Alabama since 2011 and have continuously been in good standing. I am also admitted to practice in the Northern and Middle Districts of Alabama, the Northern District of Florida, and the Eleventh Circuit Court of Appeals. I also have been admitted *pro hac vice* in the United States District Court for the Southern District of New York.

5. While my practice began as a traditional general litigation practice, for approximately the last eight years, my practice has focused primarily on complex business disputes – including complex problem solving and crisis management and resolution, internal investigations, pre-suit investigation and dispute resolution, litigation, and appeals. My litigation practice focuses on business disputes involving business torts, trade secrets, employment, restrictive covenants, shareholder disputes, corporate governance, as well as commercial disputes arising from complicated commercial transactions. I represent both plaintiffs and defendants in state and federal trial and appellate courts.

6. I was contacted by ADP, Inc. at approximately 11:00 am (CST) on Friday, March 5, 2021, to represent ADP in a show-cause hearing that was scheduled to take place that day just two hours later at 1:30 pm (CST). Based on the Court's show-cause order, and prior to conducting my investigation, I believed the show-cause hearing was the beginning of contempt proceedings against ADP and that there was a strong likelihood that ADP would be subject to contempt sanctions. Nonetheless, my firm accepted representation and appeared at the March 5th show-cause hearing.

7. After the March 5th show-cause hearing, the Court entered a second show-cause order that set a second show-cause hearing. Based on the language of the second show-cause order, I had an even stronger belief that ADP would be sanctioned at the second show-cause hearing.

8. Based on the foregoing, I was tasked with defending a new client against contempt sanctions in federal court with just one week's preparation, in a case in which I had no prior familiarity, and in a situation where it appeared likely that the client would be sanctioned based on facts that the client disputed.

9. Based on the time-sensitive and emergency nature of this representation, the time and labor that would be required (which would preclude me performing work for other clients), the complexity and skill of the work required, the high stakes and adverse financial and reputational impact of an adverse sanctions ruling, and my belief (based on the Court's two show-cause orders) that the client would likely be sanctioned, I negotiated the following hourly rates for the following individuals, which ADP agreed to pay:

Matt Jackson	Partner	\$425.00
Garrett Zoghby	Associate	\$315.00
Blake Richardson	Associate	\$315.00
Becky Gibson	Paralegal	\$220.00
Joy Massey	Paralegal	\$220.00
Leigh Lods	Paralegal	\$220.00

In my professional opinion, these hourly rates were reasonable considering the foregoing.

10. In anticipation of the second show-cause hearing, I worked over the weekend and all week to investigate the matter. Among other things, my investigation included reviewing the filings (which, at that time, were almost 300 docket entries) and hearing transcripts in this case, having discussions with various ADP representatives, having discussions with plaintiffs' and defense counsel, reviewing their correspondence, and reviewing correspondence between ADP and defense counsel. I also prepared a brief that set forth my investigative findings to the Court and argued against entering sanctions against ADP. I then prepared to defend ADP at the second show-cause hearing, and did, in fact, defend ADP at the second show-cause hearing.

11. This took a lot of time and effort within a short timeframe. During this time, I worked almost exclusively on this case due to its importance, emergency and time-sensitive nature, the apparent likelihood of sanctions, and the severity of potential adverse consequences.

12. After the second show-cause hearing, I remained engaged to assist ADP with producing information to the parties within another very short weeklong timeframe. Additionally, at ADP's request, three of my firm's paralegals also assisted ADP's legal department so that ADP would be able to produce information by Friday, March 19th. ADP was able to make the production by then, and would not have been able to do so without the assistance of the undersigned and the paralegals.

13. Since ADP retained my firm this month, we have not yet sent an invoice to ADP for our services. We will send our first invoice in April. However, I have reviewed the WIP report ("work in progress" report showing worked and entered, but unbilled, time) and cost detail report of my firm in this matter. Based on my review of these reports, Adams and Reese LLP has WIP fees of \$60,754.50 and \$890.87 in costs or expenses to be billed to ADP. True and correct copies of the computer printouts showing the costs and WIP report and individual time entries, showing worked and entered but unbilled time, are attached hereto as "Exhibit 1-A."

14. In my opinion, these amounts are reasonable fees in this community for the work performed and were necessarily incurred in this matter.

15. ADP also incurred \$813.68 in the following expenses associated with Alice Quinn's travel to and lodging in Mobile, Alabama, for the second show-cause hearing:


Flights	\$316.12 ¹
Mileage to and from airport	\$44.80
Airport parking	\$78.00
Hotel	\$184.54
Taxis to and from Mobile airport	\$117.00
Meals	\$73.22
TOTAL	\$813.68

¹ The cost of these flights were heavily discounted due to ADP having unused tickets for which they were able to use credits against the purchase price.

Receipts for these expenses are attached hereto as Exhibit 1-B. Additionally, ADP had to pay Ms. Quinn for 21 hours of overtime in order for her to attend the second show-cause hearing and prepare the various reports that were urgently requested. These 21 hours at Ms. Quinn's overtime rate of \$57.57 per hour brings the total overtime to \$1,208.97.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 29th day of March, 2021.


MATTHEW R. JACKSON

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

WILLIAM HEATH HORNADY, et al.,)	
)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION NO. 1:18-00317-JB-N
)	
OUTOKUMPU STAINLESS USA,)	
)	
Defendant.)	

ORDER

This matter is before the Court on ADP, Inc.’s Motion for Attorneys’ Fees and Costs. (Doc. 312).¹ ADP seeks an award “against Defendant and/or its counsel . . . related to ADP’s expenses incurred in this matter due to Defense Counsel’s [Gavin Appleby] misrepresentations to the Court.” (*Id.*).

In its Motion, ADP accurately sets out underlying misconduct justifying an award, as well as an accounting of the time and expenses it incurred in responding. ADP’s Motion provides a detailed Lodestar calculation of attorneys’ fees in the amount of \$60,754.50 and costs in the amount of \$2,913.52. ADP seeks a total award of \$63,668.02 for fees and costs incurred prior to the Motion. (*Id.*, PageID#3994).

Neither Defendant nor its counsel has filed an opposition to the Motion. Rather, Defendant filed a Response, stating:

On March 30, 2021, the General Counsel of Littler Mendelson, P.C. spoke with Matthew Jackson, counsel for ADP, Inc. advising him Littler would pay the fees ADP sought by way of this motion, along with any additional fees ADP would incur in the future to respond to the subpoena at issue.

¹ The Court directed ADP, Inc. to file such motion during a March 12, 2021 show-cause hearing.

(Doc. 315, PageID#4046). Defendant represents that a check in the amount requested was sent to ADP's counsel. (*Id.*). In terms of future costs and expenses, Defendant further represented:

Littler also sought from Mr. Jackson an accounting of any additional fees ADP had incurred since the motion was filed. . . . To Littler's understanding, Mr. Jackson is preparing that accounting. Once it is received, Littler will prepare a second check payable to ADP for these additional fees. If there are other fees ADP incurs, Littler will pay them promptly.

(*Id.*, PageID#4047).

At a hearing conducted April 13, 2021, Mr. Jackson confirmed receipt from Littler Mendelson, P.C. of the amount ADP sought for fees and expenses incurred prior to its Motion. Mr. Jackson further stated ADP was unwilling to withdraw its Motion, notwithstanding Defendant's payment of the amount sought in the Motion and its undertaking to pay future amounts. Counsel for Defendant stated that he had no objection to the entry of an Order granting the Motion and noting the payment made.

Based on the foregoing, upon due consideration, the Court finds and orders as follows:

1. ADP, Inc.'s Motion for Attorneys' Fees and Costs (Doc. 312) is GRANTED.
2. Defendant's counsel has fully paid and satisfied the total amount owed to ADP, Inc. pursuant to its Motion and this Order for fees and costs incurred prior to the Motion.
3. ADP shall prepare and provide to Defendant and Littler Mendelson, P.C. an accounting of all additional fees and costs ADP incurred since the filing of the Motion. Upon receipt of the said accounting, Defendant or Littler Mendelson, P.C. shall prepare and send another check, in the same manner as the first check, payable to ADP for these additional fees. Any related additional fees and costs incurred by ADP after the said

accounting shall likewise be borne by Defendant and/or Littler Mendelson, P.C.

DONE and ORDERED this 14th day of April, 2021.

/s/ JEFFREY U. BEAVERSTOCK
UNITED STATES DISTRICT JUDGE

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	2:19-cv-767-ECM-SMD
)	
DYNAMIC SECURITY, INC.,)	
Defendant.)	

**Exhibit C to
Declaration of Leslie Palmer in Support of
Petition for the Award of Attorneys' Fees and Expenses**

Miles v. Walmart Associates, Inc. et al, 4:19-cv-00756-CLM
Doc. 94 Memorandum Order (See pp. 8-12 RE: Rates)

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
MIDDLE DIVISION**

WILLIAM C. MILES, SR.,)
)
Plaintiff,)
)
v.) Case No. 4:19-cv-00756-CLM
)
WALMART ASSOCIATES,)
INC., et al.,)
)
Defendants.)

MEMORANDUM OPINION

Plaintiff William C. Miles, Sr. prevailed at trial. Miles now petitions for the award of attorney fees and costs, seeking attorney fees of \$239,033.00 and litigation expenses in the amount of \$9,851.33. (Doc. 85.) For the reasons stated within, the court will **GRANT in PART** and **DENY in PART** Miles' petition.

BACKGROUND

Miles filed this action in federal court, asserting that Defendants Walmart Associates, Inc. and Wal-Mart Stores East, LP (collectively, “Walmart”) terminated him because of his disability, in violation of the Americans with Disabilities Act (“ADA”). The jury entered a verdict for Miles and against Walmart, awarding Miles \$6,552.00 as compensation for net loss of wages and benefits to the date of the verdict. This court entered a final judgment granting Miles \$6,552.00. (Doc. 83.)

Then, Miles filed a petition, along with a brief and affidavits, seeking attorney fees and expenses. (*See* doc. 86.)

Walmart argues that Miles’ proposed fees and expenses are excessive and unreasonable. (Doc. 90.) The court will first determine an appropriate award for attorney fees, then it will determine an appropriate award for litigation expenses. In making these determinations, the court will consider the petition and all related briefs and affidavits.

LEGAL FRAMEWORK

In an ADA action, “the court, in its discretion, may allow the prevailing party . . . a reasonable attorney’s fee, including litigation expenses, and costs” 42 U.S.C. § 12205. The United States Supreme Court set the “starting point for determining the amount of the attorney fee [as] the number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate.” *Hensley v. Eckhart*, 261 U.S. 424, 443–44 (1983). This amount is known as the lodestar amount. *Id.* Once a court has determined the lodestar, the court may adjust the lodestar based on the results the attorney(s) obtained. *See Loranger v. Stierheim*, 10 F.3d 776, 781 (11th Cir. 1994).

DISCUSSION

Using this framework, the court will first calculate the appropriate lodestar. The court will then consider whether to adjust the lodestar based on Miles’ level of success.

I. Calculating the Lodestar

A. Reasonable Hours Billed

To calculate the lodestar, the court must first determine the reasonable number of hours expended. Walmart contends that the court should reduce Miles’ proposed number of hours because he cannot recover for time spent doing (1) clerical work, or (2) excessive, redundant, or otherwise unnecessary work. If a “district court finds the numbers of hours claimed is unreasonably high, the court has two choices: it may conduct an hour-by-hour analysis or it may reduce the requested hours with an across-the-board-cut.” *Bivins v. Wrap it Up, Inc.*, 548 F.3d 1348, 1350 (11th Cir. 2008).

1. Clerical Work

“A fee applicant is not entitled to compensation at an attorney’s rate . . . [for] tasks which were mundane, clerical or which did not require the full exercise of an attorney’s education and judgment.” *Norman v. Hous. Auth. of City of Montgomery*, 836 F.2d 1292, 1306 (11th Cir. 1988). Walmart seeks to subtract the hours Miles

billed for clerical tasks. (Doc. 90, pp. 12–13.) Walmart reviewed Miles’ attorneys and paralegals’ time records (docs. 86-6 through 86-16) and identified 46 hours that it claims attorneys or paralegals spent on clerical or administrative functions (*i.e.*, emailing the court reporter, calendaring deadlines, transmitting documents to the client or opposing counsel by email or mail, scanning, downloading, and saving documents, filing documents, bates labeling documents, redacting documents, communicating with the court regarding exhibit stickers, printing documents, labeling exhibits, organizing exhibits, communicating with the process server, communications regarding scheduling, preparing trial boxes, loading a vehicle, reserving hotel rooms, running trial technology, preparing checklists, paying the filing fee, preparing a conference room, calendaring of deadlines, entering notices of appearance, creating an electronic copy of trial exhibits, and saving witness contact information). (Doc. 90-1, pp. 6–14.)

Miles does not refute Walmart’s proposed reduction for attorneys or paralegals other than for Ivey E. Best. So the court will reduce the other attorneys and paralegals’ time as laid out in Walmart’s Exhibit B (*id.*) and turns to Walmart’s challenges to Best’s time logs.¹

¹ Ivey E. Best began working for Haynes & Haynes while she was still in law school. So she recorded some of her hours at a paralegal/law-clerk rate. After she graduated from law school and passed the bar exam, she recorded her hours at an associate-level attorney rate.

Miles argues that if Best logged attorney hours for time she spent doing clerical or administrative functions, then the court should consider them to be paralegal hours and award fees accordingly. This argument fails because “hours may not be charged to the opposing party if they are administrative or clerical functions, regardless of who performs them.” *Hithon v. Tyson Foods, Inc.*, 151 F. Supp. 3d 1252, 1261 (N.D. Ala. 2015). Upon review, the court agrees with Walmart that some of Best’s entries are for clerical and administrative work. But the court finds that some of the challenged entries could reasonably require an attorney’s education or experience (*e.g.*, drafting letters to her client, redacting trial exhibits, editing the trial power point, organizing trial notebooks and checklists). Having reviewed Walmart’s challenges to Best’s entries, the court determines that it will deduct 8.8 hours of Best’s logged time as a paralegal/law clerk and 8.1 hours (one-third of the challenged hours) of Best’s logged time as an attorney.

2. Excessive, Redundant, or Unnecessary Hours

In calculating a reasonable fee, the court must exclude “excessive, redundant or otherwise unnecessary hours” from the fee calculation. *Norman*, 836 F.2d at 1303 (quotation omitted).

First, Walmart contends that the court should exclude hours that Miles’ counsel devoted to unsuccessful claims. (Doc. 90, pp. 8–9.) As discussed below in

Part II.A, there are no unsuccessful claims in this case. Nor does Walmart identify any hours that Miles devoted to the allegedly unsuccessful claims.

Miles pleaded three counts in his complaint. (Doc. 1.) Miles prevailed on Count 1 at trial, and he voluntarily dismissed Counts II and III during the summary judgment stage without briefing those issues. So the court finds that it would not be proper to reduce fees or exclude hours for the time spent before summary judgment.

Next, Walmart asserts that the court should exclude time billed by Attorneys Kenneth Haynes and Best to perform the same tasks. (Doc. 90, pp. 13–14.) Walmart alleges that this reduction would be proper because Miles does not identify the “distinct contribution of each lawyer.” *Johnson v. Univ. College of Univ. of Ala. in Birmingham*, 706 F.2d 1205, 1208 (11th Cir. 1983) (finding that separate work on the same matter can be warranted if the time entries show “the distinct contribution of each lawyer to the case and the customary practice of multiple-lawyer litigation”). Miles counters that it is appropriate for a partner to assign initial work on certain tasks to an associate attorney and then to review the associate attorney’s work product. (Doc. 93, pp. 8–9.) The court finds that Miles did identify each lawyer’s distinct contribution because Haynes’ entries specify that he revised or reviewed Best’s work. So the court finds that the evidence does not show that Haynes and Best performed duplicative work and does not reduce the award for duplication.

Finally, Walmart asserts that the court should exclude 10.2 hours that Attorney Brian Noble spent getting “up to speed” on the case. (Doc. 90, pp. 14–15.) Walmart relies on a case decided in the Middle District of Florida to support its assertion—*Satterfield v. CFI Sales & Mktg.*, No. 6:09-cv-1827-Orl-28DAB, 2012 U.S. Dist. LEXIS 188315, * 22 (M.D. Fla. Dec. 18, 2012). But the facts here are distinguishable from the facts in *Satterfield* because the plaintiff in *Satterfield* engaged in controversial conduct, causing his counsel to withdraw from the case; the court found that the defendants should not bear the cost of the plaintiff’s new counsel getting up to speed on the case and deducted 58.6 hours from the fee award.

In contrast, Miles worked with the same law firm (Haynes & Haynes) throughout his entire litigation. Haynes assigned Noble the task of responding to Walmart’s motion for summary judgment. Miles contends that the objected-to entries reflect time Noble spent preparing a response to Walmart’s motion for summary judgment. Walmart does not present evidence that another attorney read through all pleadings, orders, discovery documents, depositions, exhibits, and briefs in preparation to respond to a motion for summary judgment. Any attorney preparing a response to a motion for summary judgment would need to read and analyze these documents. So the court will not reduce Noble’s hours.

B. Reasonable Hourly Rates

Having established the reasonable number of hours expended, the court must now determine the reasonable hourly rates to calculate the lodestar. “A reasonable hourly rate is the prevailing market rate in the relevant legal community for similar services by lawyers of reasonably comparable skills, experience, and reputation.” *Norman*, 836 F.2d at 1299 (citations omitted). Miles must provide “either direct evidence of rates charged under similar circumstances or opinion evidence of reasonable rates.” *See Duckworth v. Whisenant*, 97 F.3d 1393, 1396 (11th Cir. 1996). The court may also make an independent assessment to determine a reasonable hourly rate. *Norman*, 836 F.2d at 1303.

Miles asks the court to find the following hourly rates reasonable: Kenneth Haynes, \$510; Charles Guerrier, \$545; Gina Coggin, \$375; Brian Noble, \$400; Ivey Best (attorney time), \$225; Ivey Best (paralegal time), \$100; Mariah Welter, \$125; Lauren Branham, \$100; Murrell Wilkinson, \$100; Sarah Stephens, \$90; Shannon Napier, \$90. Walmart only challenges two attorneys’ hourly rates—Haynes (\$510.00) and Noble (\$400.00)—asserting that their rates exceed reasonable rates in the market for attorneys of similar experience. Because Walmart does not challenge the other attorneys and paralegals’ fees, the court finds that Miles’ proposed billing rates for the other attorneys and paralegals are proper. The court will now calculate

proper billing rates for Haynes and Noble.

Haynes: Miles proposed that the court award Haynes \$510.00 per hour for his services. In his affidavit, Haynes states that the prevailing market rate in the Northern District of Alabama for plaintiff attorneys in similar cases ranges from \$375.00 to \$650.00 per hour based on the attorney's skill level. (Doc. 86-1 ¶ 5.) In 2017, Judge Bowdre reduced Haynes' proposed hourly rate to \$420.00 per hour. *King v. CVS Health Corporation*, 1:12-cv -01715-KOB, 2017 WL 6336323, at *4–5 (N.D. Ala. Dec. 12, 2017). In 2018, Judge Kallon also reduced Haynes' proposed rate to \$420.00 per hour, accepting the rate Judge Bowdre awarded Haynes the year before. *Anderson v. Surgery Ctr. of Cullman*, No. 2:12-CV-00598-AKK, 2018 WL 8807149, at *11 (N.D. Ala. Aug. 27, 2018), *aff'd*, 839 F. App'x. 364 (11th Cir. 2020). This court will adopt the rate that Judge Bowdre found reasonable for Haynes in *King*, apply a 2.5% rate of annual increase to adjust for the rate for inflation, and round up for ease of calculation. As shown Table 1, the court finds that \$465.00 is a reasonable hourly billing rate for Haynes.

Table 1: Reasonable Hourly Billing Rate - Haynes

YEAR	BASE RATE	2.5%	APPLICABLE RATE
2017	\$420.00 (approved by Judge Bowdre on 12/12/17)	N/A	\$420.00
2018	\$420	\$10.50	\$430.50
2019	\$430.50	\$10.76	\$441.26
2020	\$441.26	\$11.03	\$452.29
2021	\$452.29	\$11.31	\$463.60 (rounded up to \$465.00)

Noble: Miles proposed that the court award Noble \$400.00 per hour for his services. Noble has 11 years' experience practicing law. (Doc. 86-4 ¶ 3.) None of Miles' proffered declarations listed a market rate for an attorney with Noble's level of experience. So Walmart relied on Attorney Heather Leonard's affidavit to argue that the court should award Noble—as an associate attorney—\$300.00 per hour. (Doc. 86-20 ¶ 5.) Miles asserts that Walmart's argument is flawed because Haynes & Haynes is a closely held plaintiff firm that does not follow the associate-to-partner track commonly used in larger defense firms. But other than the attorneys' affidavits, Miles does not provide any evidence to support the \$400.00 hourly billing rate. So the court will use opinion evidence to make its own determination.

In 2018, Judge Kallon awarded an attorney with over 10 years of litigation experience a reasonable billing rate of \$315.00 per hour. *Anderson*, 2018 WL 8807149. The court will use the amount Judge Kallon awarded to an attorney with

similar experience, adjust that amount for inflation, and round up for ease of calculation. As shown in Table 2, the court finds that \$340.00 is a reasonable hourly billing rate for Noble.

Table 2: Reasonable Hourly Billing Rate - Noble

YEAR	BASE RATE	2.5%	APPLICABLE RATE
2018	\$315.00 (approved by Judge Kallon on 8/27/18)	N/A	\$315.00
2019	\$315.00	\$7.88	\$322.88
2020	\$322.88	\$8.07	\$330.95
2021	\$330.95	\$8.27	\$339.22 (rounded up to \$340.00)

C. Court-Approved Lodestar Calculations

Now that the court has determined the allowable expendable hours and the allowable billing rates, the court will determine the appropriate lodestar amount. As shown in Table 3, the court finds that the proper lodestar amount is \$216,175.50.

Table 3: Lodestar Calculations

Timekeeper	Submitted Time	Allowed Time	Submitted Hourly Rate	Allowed Hourly Rate	Lodestar
Kenneth Haynes	336.4	336.2	\$510	\$465	\$156,333.00
Charles Guerrier	7.1	7.1	\$545	\$545	\$3,869.50
Gina Coggin	8.6	8.6	\$375	\$375	\$3,225.00
Brian Noble	66.7	66.7	\$400	\$340	\$22,678.00
Ivey Best (attorney)	101.5 ²	93.4	\$225	\$225	\$21,015.00

² There is a discrepancy between Best's Reports of Attorney Time and Paralegal Time (docs. 86-7, 86-11) and the

Ivey Best (paralegal)	30.5	21.7	\$100	\$100	\$2,170.00
Mariah Welter	36.6	27.2	\$125	\$125	\$3,400.00
Lauren Branham	5.2	5	\$100	\$100	\$500.00
Murrell Wilkinson	7	6	\$100	\$100	\$600.00
Sarah Stephens	7.8	6	\$90	\$90	\$540.00
Shannon Napier	20.5	20.5	\$90	\$90	\$1845.00
TOTAL					\$216,175.50

II. Adjustment to the Lodestar

“After determining the lodestar amount . . . the court is entitled to adjust the amount of final fees awarded in light of the results obtained through the litigation.” *Duckworth*, 97 F.3d at 1399. The court may adjust the amount downward “if the prevailing party was [only] partially successful in its efforts.” *Resolution Trust Corp. v. Hallmark Builders, Inc.*, 996 F.2d 1144, 1150 (11th Cir. 1993). But there is a “‘strong presumption’ that the lodestar is the reasonable sum the [prevailing] attorneys deserve.” *Bivins*, 548 F.3d at 1350. Walmart argues that the court should adjust the lodestar downward because of Miles’ limited success and because Miles’ jury award does not justify such a large fee award. (Doc. 90 at 7–11.)

A. Limited Success

Lodestar Summary (doc. 86-17). Because Best edited her Reports to remove non-recoverable hours, the court relies on Best’s Reports—not on the Lodestar Summary—to determine the correct submitted time.

“A court should not award fees for time spent on unrelated, unsuccessful claims.” *Shannon v. BellSouth Telecomms., Inc.*, 292 F.3d 712, 717 (11th Cir. 2002) (internal quotations and citations omitted). But if multiple claims “involve a common core of facts or [are] based on related legal theories, . . . [they should not] be viewed as a series of discrete claims . . .” *Hensley*, 461 U.S. at 435.

In his Complaint, Miles presented three counts, asserting that Walmart: (Count I) terminated him because of his disability; (Count II) used unlawful screening criteria; and (Count III) failed to accommodate his disability. (Doc. 1.) In his response to Walmart’s motion for summary judgment, Miles voluntarily dismissed Counts II and III. (Docs. 27, 42, 43). Walmart erroneously stated that the lodestar should be reduced because Miles succeeded on only one of his three original claims. Miles contends that he only presented one claim—a claim that Walmart violated the ADA when it terminated his employment—and that the three counts represented multiple theories of liability under the same claim. (Doc. 93, pp. 1–3.) Even if the three theories of liability were construed as three separate claims, they “involve a common core of facts or [are] based on related legal theories.” *Hensley*, 461 U.S. at 435. So the court does not view the three counts as discrete claims, and “the court’s rejection of or failure to reach certain grounds is not a sufficient reason for reducing a fee.” *Id.*

B. Jury Award

The public has an interest in vindicating civil rights, beyond “the value of a civil rights remedy to a particular plaintiff.” *Riverside v. Rivera*, 477 U.S. 561, 574 (1986). Because of the important public interest, “Congress did not intend for fees in civil rights cases . . . to depend on [the plaintiff] obtaining substantial monetary relief.” *Id.* at 575.

Walmart contends that the court should reduce the lodestar by 33.3% because the jury only awarded Miles \$6,552.00, even though he asked the jury to award him \$155,484.00 (\$77,742.00 in lost wages and \$77,742.00 in emotional damages). (Doc. 90 at 11.) Miles’ award is relevant in determining reasonable attorneys’ fees, but the court considers Miles’ award as one of several factors. *See id.* at 574. The court also considers that Miles’ counsel expended substantial effort—and took substantial risk—to help Miles vindicate his rights. The court recognizes that Miles’ counsel did not accept other clients because they agreed to represent Miles. So the court will not reduce the lodestar amount because Miles only recovered \$6,552.00.

III. Expenses

The court will now evaluate Miles’ proposed litigation expenses. “All reasonable expenses incurred in case preparation, during the course of litigation, or as an aspect of settlement of the case may be taxed as costs under section 1988.” 42

U.S.C. § 1988; *Dowdell v. City of Apopka*, 698 F.2d 1181, 1192 (11th Cir.1983).

Miles is seeking reimbursement for \$9,851.22 in litigation expenses.

Miles asks the court to find the following litigation expenses reasonable: Meals During Trial, \$239.26; Mileage, \$358.40; Hotel, \$944.62; Mediation, \$2,450.00; Legal Research, \$941.42; Expert Witness Fee, \$2,500.00; Medical Records, \$406.00; Postage, \$76.18; Office Supplies, \$70.06; Photocopies, \$1,865.38. Walmart challenges several of Miles' claimed litigation expenses, arguing that certain litigation expenses are excessive, unreasonable, or improperly claimed. The court will grant all unopposed litigation expenses. The court will address each challenged expense below.

A. Meals During Trial

Meals for an out-of-town trial are reasonable litigation expenses and are recoverable. *Oden v. Vilsack*, 2013 WL 4046456, at *19, *20 (S.D. Ala. Aug. 9, 2013) (awarding expenses for lodging and meals); *Cromer-Tyler v. Teitel*, 2007 WL 2684878, at *6 (M.D. Ala. Sept. 11, 2007) (awarding expenses for attorney mileage and meals). Miles claimed \$239.26 for meals consumed during trial. Walmart challenged one meal expense—a \$96.30 fee for two attorneys to have lunch at Classic on Noble after trial ended. (Doc. 90, p. 20.) Miles withdrew this meal charge in reply. So the court will reduce the approved litigation expenses by \$96.30.

B. Expert Witness Fee

Expert witness fees are generally recoverable in ADA cases. *Hansen v. Deercreek Plaza, LLC*, 420 F. Supp. 2d 1346, 1353 (S.D. Fla. 2006). Miles claims \$2,500.00 as an expert witness fee to pay Dr. Sparks. (Doc. 86-1, p. 15). Walmart contends that this fee is not proper because Miles did not designate Dr. Sparks as an expert and because the court ruled that Dr. Sparks could only testify as a fact witness. (Doc. 90, pp. 15–16; *see also* doc. 56.) In his reply, Miles re-labels the \$2,500.00 expert witness fee as a deposition fee. (Doc. 93, p. 14.) The court agrees with Walmart and finds that Miles cannot recover the \$2,500.00 fee paid to Dr. Sparks as an expert witness fee. The court reduces the approved litigation expenses by \$2,500.00.

C. Medical Records

Medical records that are “possibly relevant” to a plaintiff’s damages are recoverable litigation expenses. *O’Neal v. Norfolk S. R.R. Co.*, 5:16-CV-519 (MTT), 2018 WL 6005425, at *4 (M.D. Ga. Nov. 15, 2018). Miles claims \$406 for the cost of obtaining copies of his medical records, specifying that Haynes & Haynes uses a third-party vendor to obtain copies of medical records. (Doc. 86-1, pp. 16–17.) First, Walmart challenges the fees of \$154.50 and \$112.00 to obtain records from Sparks Orthopedic and Sports Medicine; Walmart provided evidence that it obtained

records from the same medical provider for \$31.00. (*Id.*) Miles counters that the fee is higher because he used a third-party vendor to obtain the records and explains that he had to obtain the records from Dr. Sparks “more than once because [he] received subsequent treatment and requested the additional records.” (Doc. 93, p. 15.) The court finds that it was reasonable for Miles to request the records again after he received follow-up treatment. The court also finds that it is reasonable for a law firm to employ the use of a third-party vendor to obtain medical records.

Next, Walmart challenges the fee of \$139.50 for Miles to subpoena records from First Care Medical Clinic. Miles claimed that he obtained these records in response to Walmart’s discovery requests. (Doc. 86-1, p. 16.) Walmart argues that the court should exclude this expense because Miles did not produce the First Care Medical Clinic records in response to Walmart’s discovery requests. (Doc. 90, p. 19.) The court finds that even if the medical records were not responsive, they were possibly relevant to Miles’ litigation. So the court will not reduce Miles’ litigation expenses for medical records.

D. Office Supplies

Specific office supplies necessary for trial that the lawyers are unlikely to use for other cases may be recoverable litigation expenses. *Casias v. Dept. of Corr.*, 2019 WL 2881007, at *6 (D.N.M. July 3, 2019). Miles claimed \$70.07 for a 25-foot

HDMI cord he bought to use during trial. But Miles withdrew his request for this expense in his reply in support of his fee petition. (Doc. 93, p. 14.) So the court will reduce the approved litigation expenses by \$70.07.

E. Photocopies

Photocopies that are “necessarily obtained for use in the case” are a recoverable expense, but “general copying costs” are not. *See Duckworth*, 97 F.3d at 1399. A party seeking copy costs must present evidence “regarding the documents copied including their use or intended use.” *Cullens v. Georgia Dept. of Transp.*, 29 F.3d 1489, 1494 (11th Cir. 1994). Miles claims \$1,865.38 for photocopies he made during litigation (9,481 total copies, minus 1,002 copies included in the Bill of Costs, at \$0.22 per copy).

Other than Haynes’ affidavit stating that the copies were case-related and were necessary (doc. 86-1, p. 18), Miles fails to present evidence about the documents copied or their purpose. In a case in the Southern District of Alabama, a court recently refused to assess the plaintiff’s copying costs against the defendant because the plaintiff only described each photocopy as “copy,” making it impossible for the court to “determine whether the copies were necessary.” *Nicholson v. RB2, LLC*, No. 1:19-CV-344-TFM-N, 2021 WL 895602, at *7 (S.D. Ala. Mar. 9, 2021). Though some courts decline to award any copying costs when the requesting party fails to

provide enough information, this court finds that Miles incurred significant copying costs and that some recovery is appropriate. The court will reduce the number of allowable copies by 25% (8,479 copies to 6,359 copies).

Walmart argues that \$0.22 per copy is unreasonable. The court agrees with Walmart and finds that \$0.10 per copy is a reasonable cost for copies—a finding that aligns with the holding in another court in this district. *See Anderson*, 2018 WL 8807149, at *6 (N.D. Ala. Aug. 27, 2018). So Miles may recover \$635.90 in copying costs (6,359 copies at \$0.10 per copy) as reasonable litigation expenses. The court will reduce the approved litigation expenses by \$1,229.48 (\$1,865.38 minus \$635.90).

F. Court-Approved Litigation Expenses

Now that the court has determined the amount it will deduct for each challenged category, the court will determine the appropriate amount for litigation expenses. As shown in Table 4, the court finds that the proper amount for litigation expenses is \$5,955.48.

Table 4: Approved Litigation Expenses


Category	Requested Amount	Approved Amount
Meals During Trial	\$239.26	\$142.96
Mileage	\$358.40	\$358.40
Hotel	\$944.62	\$944.62
Mediation	\$2,450.00	\$2,450.00
Legal Research	\$941.42	\$941.42
Expert Witness Fee	\$2500.00	\$0.00
Medical Records	\$406.00	\$406.00
Postage	\$76.18	\$76.18
Office Supplies	\$70.06	\$0.00
Photocopies	\$1,865.38	\$635.90
TOTAL		\$5,955.48

CONCLUSION

For the reasons stated above, the court will **GRANT in PART** and **DENY in PART** Miles' petition for attorneys' fees and litigation expenses. The court will **AWARD** Miles \$216,175.50 in attorneys' fees and \$5,955.48 in litigation expenses.

The court will enter a separate Order consistent with this Opinion.

DONE on January 28, 2022.


COREY L. MAZE
UNITED STATES DISTRICT JUDGE

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	2:19-cv-767-ECM-SMD
)	
DYNAMIC SECURITY, INC.,)	
Defendant.)	

**Exhibit D to
Declaration of Leslie Palmer in Support of
Petition for the Award of Attorneys' Fees and Expenses**

Barber v. TPC of Blount County Alabama, Inc. 4:18-cv-01633

Doc. 80, Order (Granting attorney's fees as unopposed at a rate of \$450/hour)

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
MIDDLE DIVISION**

DAWN BARBER,

Plaintiff,

V.

Case No. 4:18-CV-1633-CLM


**TPC OF BLOUNT COUNTY
ALABAMA INC.,**

Defendant.

ORDER

This case is before the court on Plaintiff Dawn Barber’s Unopposed Motion to Set Attorneys’ Rates (doc. 76). Barber requests this Court to enter an Order setting attorneys Sonya Edwards’ and Kira Fonteneau’ rate as \$450 per hour. After review of the relevant affidavits, the Court **GRANTS** the motion.

DONE and **ORDERED** on July 1, 2021.


COREY L. MAZE
 UNITED STATES DISTRICT JUDGE

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	2:19-cv-767-ECM-SMD
)	
DYNAMIC SECURITY, INC.,)	
Defendant.)	

**Exhibit E to
Declaration of Leslie Palmer in Support of
Petition for the Award of Attorneys' Fees and Expenses**

Declaration of Plaintiff, Davita Key Regarding Search for Legal Counsel

**DECLARATION OF PLAINTIFF, DAVITA KEY
IN SUPPORT OF PETITION FOR THE AWARD OF ATTORNEYS' FEES**

1. My name is Davita Key and I have personal knowledge of the facts articulated in this declaration. I swear under penalty of perjury, pursuant to 28 U.S.C. § 1746 that the following is true and accurate to the best of my knowledge.

2. I had a difficult time finding an attorney to represent me on my case.

3. I contacted and spoke with approximately 10-20 attorneys in the Montgomery and Tuskegee areas before hiring Attorneys Palmer and Leonard. Attorneys in and around Montgomery would turn down representation stating they

had a conflict of interest with the large employer, or they were not interested in the subject matter.

4. One attorney stated he believed me, but that I would not win in the jurisdiction.

5. One attorney initiated contact with at least one defendant but ultimately did not agree to represent me in litigation.

6. After an extensive search in the area, I broadened my internet search to Alabama Employment Law attorneys and was able to contract with Attorneys Palmer and Leonard.

7. Based on my personal experience, there are few attorneys in the Montgomery area exclusively practicing in employment cases for individuals, who are willing to take the case through litigation.

Date: March 28, 2024

A handwritten signature in black ink, appearing to read "Davita Key", written over a horizontal line.

Davita Key

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Palmer Law LLC
2052853050104 23rd Street South,
Suite 100
Birmingham, AL 35233
US

Amount Due

\$4,182.58

Billed To

Davita Key
3044 Spring Hill Parkway SE Apt E
Smyrna, GA 30080

Matter

Key v. HMMA et al

Invoice Number

00006

Date of Issue

03/28/2024

Due Date

04/27/2024

Expense Entries

Date	Description	Rate	Qty	Line Total
07/27/2022	Unemployment Hearing Audio File	\$5.00	1.00	\$5.00
08/29/2022	HMMA 30(b)(6) Deposition	\$2,117.24	1.00	\$2,117.24
10/20/2022	Unemployment Hearing Transcript	\$446.70	1.00	\$446.70
10/20/2022	Dynamic Security 30(b)(6) Deposition	\$1,613.64	1.00	\$1,613.64
Expenses Total:			4	\$4,182.58
Total				\$4,182.58
Amount Due				\$4,182.58

Outstanding Invoices

Number	Due Date	Amount	Payments	Balance
00006 (current)	04/27/2024	\$4,182.58	\$0.00	\$4,182.58
Outstanding Balance				\$4,182.58



Leslie Palmer
Palmer Law, LLC
104 23rd Street South
Suite 100
Birmingham, AL 35233

INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
20266	9/28/2022	11766
Job Date	Case No.	
8/19/2022	2:19-CV-767-ECM-SMD	
Case Name		
Key v. Hyundai Motor Manufacturing Alabama LLC., et al.		
Payment Terms		
Please remit payment in 15 days		

ORIGINAL TRANSCRIPT OF:

Kristal Riddle	259.00	Pages	@	3.680	953.12
Full Day Per Diem	1.00		@	160.000	160.00
Scanned exhibits	3.00		@	0.300	0.90
Processing	1.00		@	20.000	20.00

ORIGINAL TRANSCRIPT OF:

Sherry Spiers	109.00	Pages	@	3.680	401.12
Scanned exhibits	195.00		@	0.300	58.50
Processing	1.00		@	20.000	20.00

TOTAL DUE >>> \$1,613.64

Thank you for your business! Hard copies of this transcript are available upon request. You can pay online at www.citedepos.com, call us at 866.993.0207 or mail payment to:

Cite, LLC
PO Box 6173
Montgomery, AL 36106

THANK YOU!

Tax ID: 82-1643675

Please detach bottom portion and return with payment.

Leslie Palmer
Palmer Law, LLC
104 23rd Street South
Suite 100
Birmingham, AL 35233

Invoice No. : 20266
Invoice Date : 9/28/2022
Total Due : \$1,613.64

Remit To: **Cite, LLC**
PO Box 6173
Montgomery, AL 36106

Job No. : 11766
BU ID : CITE BHAM
Case No. : 2:19-CV-767-ECM-SMD
Case Name : Key v. Hyundai Motor Manufacturing
Alabama LLC., et al.



Leslie Palmer
Palmer Law, LLC
104 23rd Street South
Suite 100
Birmingham, AL 35233

INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
20254	9/28/2022	12169
Job Date	Case No.	
9/23/2022		
Case Name		
State of Alabama Hearings and Appeals Unit		
Payment Terms		
Please remit payment in 15 days		

ORIGINAL TRANSCRIPT OF:

Unemployment Hearing

Writing Time

Processing

59.00	Pages	@	6.300	371.70
1.00	Hours	@	55.000	55.00
1.00		@	20.000	20.00

TOTAL DUE >>>

\$446.70

Thank you for your business! Hard copies of this transcript are available upon request. You can pay online at www.citedepos.com, call us at 866.993.0207 or mail payment to:

Cite, LLC
PO Box 6173
Montgomery, AL 36106

THANK YOU!

Tax ID: 82-1643675

Please detach bottom portion and return with payment.

Leslie Palmer
Palmer Law, LLC
104 23rd Street South
Suite 100
Birmingham, AL 35233

Invoice No. : 20254
Invoice Date : 9/28/2022
Total Due : \$446.70

Remit To: **Cite, LLC**
PO Box 6173
Montgomery, AL 36106

Job No. : 12169
BU ID : CITE BHAM
Case No. :
Case Name : State of Alabama Hearings and Appeals Unit

PALMER LAW, LLC
104 23rd Street South, Suite 100
Birmingham, AL 35233
(205) 285-3050

July 27, 2022

Department of Labor
ATTN: Cashier's Office
649 Monroe Street
Montgomery, AL 36131

RE: Hearing Recording Request: Davita M Key

Dear Sir or Madam:

I am writing to request the recording for the unemployment appeal hearing further described below:

Claimant Complete Name: Davita M Key
Claimant Last Four SSN: 2138
Date of Hearing: September 19, 2017 (9/19/17)
Time of Hearing: 10:00 AM CDT

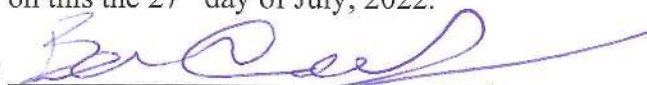
I have enclosed a check from my firm in the amount of \$5.00 for this recording. If you are in need of any further information, please contact me, Leslie Palmer, at (205) 285-3050 or by e-mail at leslie@palmerlegalservices.com.

The recording can be returned to my office at 104 23rd Street South, Suite 100, Birmingham, AL 35233.

Sincerely,


Leslie Palmer

This request sworn and subscribed to me, a Notary Public, by Leslie Palmer, the above signatory on this the 27th day of July, 2022.


My Commission Expires: 11/5/24

Palmer Law LLC
104 23rd Street South
Suite 100
Birmingham, AL 35233

(205) 285-3050

1195
84-7041/2652

July 27 2022

Pay to the Order of Department of Labor

Five & No 100

\$ 500

Dollars

Security Features on Back

iberiaBank

For Transcript Recording "Kel"

[Redacted Signature]

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	2:19-cv-767-ECM-SMD
)	
DYNAMIC SECURITY, INC.,)	
Defendant.)	

Palmer Law, LLC Copies

Dynamic 30(b)(6) and Cureton
Deposition Exhibits 1 set



Order Date 08/18/2022 1:30pm

Order Details

Pickup

OfficeMax®

5275 Highway 280 South Ste 101
Birmingham, AL 35242 USA
(205) 980-2511

Order Summary

Order Placed	Aug 18, 2022
--------------	--------------

Item Subtotal:	\$33.26
----------------	---------

Taxes:	\$2.99
--------	--------

Order Total	\$36.25
--------------------	----------------

Payment

Account #: 98344785**Amount:** \$36.25

Additional Info

Ordered By: PALMERLAWAL**Phone:** (105) 285-3050**Last Updated:** 08/18/2022**Updated By:** JWWW

Store Pickup 1 of 1

ORDER NUMBER	ORDER STATUS	TOTAL
263136745-001	Ready For Pickup	\$36.25

Ready for Pickup Today



Copies

Item #870284

Qty: 1 @ \$34.32 / each

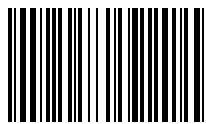
\$34.32



Custom Product

Comments: Print Merge

Store Purchase



263136745 001

Item Subtotal:	\$33.26
Taxes:	\$2.99

Order Total	\$36.25
--------------------	----------------

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	2:19-cv-767-ECM-SMD
)	
DYNAMIC SECURITY, INC.,)	
Defendant.)	

**Exhibit G to
Declaration of Leslie Palmer in Support of
Petition for the Award of Attorneys' Fees and Expenses**

Leslie Palmer Unredacted Time

Invoice

Palmer Law LLC

104 23rd Street South, Suite 100
Birmingham, AL 35233
US

Matter

Key v. HMMA et al

Date of Issue

03/28/2024

Davita Key
3044 Spring Hill Parkway SE Apt E
Smyrna, GA 30080

Time Entries

Date	Timekeeper	Description	Hourly Rate	Qty	Line Total
03/06/2020	Leslie Palmer	Review voicemail message and log return call from D.K.	\$400.00	0.1	\$40.00
03/09/2020	Leslie Palmer	6 email sent/reviewed regarding confirmation of meeting, case documents and need for extension before meeting	\$400.00	0.2	\$80.00
03/12/2020	Leslie Palmer	Email from CLT RE: EEOC documents for case review. Review all documents	\$400.00	0.3	\$120.00
03/12/2020	Leslie Palmer	Email RE: Rule 11 from HMMA	\$400.00	0.2	\$80.00
03/12/2020	Leslie Palmer	1 email sent/reviewed regarding Key v HMMA et al	\$400.00	0.1	\$40.00
03/16/2020	Leslie Palmer	3 email sent/reviewed regarding Thursday Meeting	\$400.00	0.1	\$40.00
03/17/2020	Leslie Palmer	3 email sent/reviewed regarding Thursday Meeting	\$400.00	0.1	\$40.00
03/19/2020	Leslie Palmer	3 email sent/reviewed regarding Case Information and documents related to case (34 attachments)	\$400.00	0.3	\$120.00
03/24/2020	Leslie Palmer	1 email sent/reviewed regarding phone records	\$400.00	0.1	\$40.00
03/31/2020	Leslie Palmer	1 email sent/reviewed regarding phone records	\$400.00	0.1	\$40.00
04/01/2020	Leslie Palmer	Teams meeting with HL and client RE case analysis	\$400.00	0.5	\$200.00
04/02/2020	Leslie Palmer	1 email sent/reviewed regarding phone records	\$400.00	0.1	\$40.00
04/15/2020	Leslie Palmer	2 email sent/reviewed regarding phone records	\$400.00	0.1	\$40.00
04/17/2020	Leslie Palmer	Teams meeting RE MTD Response/AMD Complaint	\$400.00	0.4	\$160.00
04/22/2020	Leslie Palmer	Draft, review and edit amended complaint.	\$400.00	2.2	\$880.00
04/22/2020	Leslie Palmer	9 email sent/reviewed regarding FWD case documents from client	\$400.00	0.2	\$80.00
04/24/2020	Leslie Palmer	16 email sent/reviewed regarding FWD documents	\$400.00	0.2	\$80.00
04/24/2020	Leslie Palmer	Review and analyze case documents from EEOC to prepare for appearance and amended complaint	\$400.00	0.4	\$160.00

05/06/2020	Leslie Palmer	1 email sent/reviewed regarding case	\$400.00	0.1	\$40.00
05/12/2020	Leslie Palmer	2 email sent/reviewed regarding case	\$400.00	0.1	\$40.00
05/19/2020	Leslie Palmer	11 email sent/reviewed regarding hair discrimination response to MTD, motion to amend	\$400.00	0.2	\$80.00
05/20/2020	Leslie Palmer	draft and file notice of appearance	\$400.00	0.2	\$80.00
05/20/2020	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
05/20/2020	Leslie Palmer	10 email sent/reviewed regarding case documents, notice of appearance, hair discrimination, motion to amend	\$400.00	0.2	\$80.00
05/21/2020	Leslie Palmer	3 email sent/reviewed regarding Natural Hair Discrimination	\$400.00	0.1	\$40.00
05/27/2020	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
05/29/2020	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
06/01/2020	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
06/01/2020	Leslie Palmer	4 email sent/reviewed regarding amended complaint, Key v. HMMA et al	\$400.00	0.1	\$40.00
06/02/2020	Leslie Palmer	6 email sent/reviewed regarding Case Update	\$400.00	0.1	\$40.00
06/02/2020	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
06/12/2020	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
06/15/2020	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
06/16/2020	Leslie Palmer	1 email sent/reviewed regarding Change of Address	\$400.00	0.1	\$40.00
06/16/2020	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
06/17/2020	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
06/26/2020	Leslie Palmer	3 email sent/reviewed regarding Case	\$400.00	0.1	\$40.00
07/03/2020	Leslie Palmer	1 email sent/reviewed regarding Crown Coalition	\$400.00	0.1	\$40.00
07/06/2020	Leslie Palmer	1 email sent/reviewed regarding Key v Hyundai	\$400.00	0.1	\$40.00
07/08/2020	Leslie Palmer	Draft - Resp to MTD.	\$400.00	3.2	\$1,280.00
07/08/2020	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
07/08/2020	Leslie Palmer	1 email sent/reviewed regarding Response to MTD	\$400.00	0.1	\$40.00
07/15/2020	Leslie Palmer	3 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
07/16/2020	Leslie Palmer	Review and analyze MTD reply briefs	\$400.00	0.4	\$160.00
07/27/2020	Leslie Palmer	2 email sent/reviewed regarding	\$400.00	0.1	\$40.00

		Case			
08/22/2020	Leslie Palmer	1 email sent/reviewed regarding Case	\$400.00	0.1	\$40.00
08/24/2020	Leslie Palmer	2 email sent/reviewed regarding case	\$400.00	0.1	\$40.00
08/28/2020	Leslie Palmer	1 email sent/reviewed regarding Paycheck	\$400.00	0.1	\$40.00
10/11/2020	Leslie Palmer	1 email sent/reviewed regarding case	\$400.00	0.1	\$40.00
10/12/2020	Leslie Palmer	1 email sent/reviewed regarding case	\$400.00	0.1	\$40.00
10/13/2020	Leslie Palmer	2 email sent/reviewed regarding case	\$400.00	0.1	\$40.00
10/30/2020	Leslie Palmer	2 email sent/reviewed regarding Case	\$400.00	0.1	\$40.00
11/09/2020	Leslie Palmer	1 email sent/reviewed regarding Case	\$400.00	0.1	\$40.00
11/24/2020	Leslie Palmer	1 email sent/reviewed regarding Case	\$400.00	0.1	\$40.00
01/22/2021	Leslie Palmer	2 email sent/reviewed regarding Case	\$400.00	0.1	\$40.00
04/05/2021	Leslie Palmer	1 email sent/reviewed regarding How hair discrimination impacts Black Americans	\$400.00	0.1	\$40.00
04/30/2021	Leslie Palmer	1 email sent/reviewed regarding Hello	\$400.00	0.1	\$40.00
06/03/2021	Leslie Palmer	1 email sent/reviewed regarding Update	\$400.00	0.1	\$40.00
07/16/2021	Leslie Palmer	1 email sent/reviewed regarding Update	\$400.00	0.1	\$40.00
07/21/2021	Leslie Palmer	2 email sent/reviewed regarding Update to case	\$400.00	0.1	\$40.00
08/31/2021	Leslie Palmer	Review and analyze MTD order	\$400.00	0.4	\$160.00
08/31/2021	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
09/01/2021	Leslie Palmer	Review and analyze draft documents from HL to go to defendants	\$400.00	0.2	\$80.00
09/01/2021	Leslie Palmer	1 email sent/reviewed regarding Rule 26 report and proposed protective order	\$400.00	0.1	\$40.00
09/01/2021	Leslie Palmer	2 email sent/reviewed regarding Employment Update, Updated on Case	\$400.00	0.1	\$40.00
09/01/2021	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
09/08/2021	Leslie Palmer	3 email sent/reviewed regarding Rule 26 report and proposed protective order	\$400.00	0.1	\$40.00
09/09/2021	Leslie Palmer	6 email sent/reviewed regarding Rule 26 report and proposed protective order	\$400.00	0.2	\$80.00
09/13/2021	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
09/14/2021	Leslie Palmer	Review and analyze answer by HMMA	\$400.00	0.3	\$120.00

09/14/2021	Leslie Palmer	Review and analyze answer by HEA	\$400.00	0.3	\$120.00
09/14/2021	Leslie Palmer	3 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
09/15/2021	Leslie Palmer	Review and analyze answer by Dynamic	\$400.00	0.4	\$160.00
09/17/2021	Leslie Palmer	Planning Meeting	\$400.00	0.5	\$200.00
09/17/2021	Leslie Palmer	1 email sent/reviewed regarding draft Rule 26 report	\$400.00	0.1	\$40.00
09/21/2021	Leslie Palmer	4 email sent/reviewed regarding draft rule 26 report	\$400.00	0.1	\$40.00
09/22/2021	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
09/22/2021	Leslie Palmer	2 email sent/reviewed regarding draft rule 26 report	\$400.00	0.1	\$40.00
09/23/2021	Leslie Palmer	3 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
09/23/2021	Leslie Palmer	13 email sent/reviewed regarding draft Rule 26 report	\$400.00	0.2	\$80.00
09/24/2021	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
09/24/2021	Leslie Palmer	2 email sent/reviewed regarding Word Version of proposed protective order	\$400.00	0.1	\$40.00
10/06/2021	Leslie Palmer	1 email sent/reviewed regarding Case	\$400.00	0.1	\$40.00
10/07/2021	Leslie Palmer	5 email sent/reviewed regarding Draft Rule 26 Report	\$400.00	0.1	\$40.00
10/12/2021	Leslie Palmer	9 email sent/reviewed regarding initial disclosures	\$400.00	0.2	\$80.00
10/12/2021	Leslie Palmer	Review and discuss Def Initial Disclosures	\$400.00	0.2	\$80.00
10/13/2021	Leslie Palmer	8 email sent/reviewed regarding Request for Copy of Dynamic insurance, document indexes of initial disclosures, objection to designation of documents as confidential	\$400.00	0.1	\$40.00
11/01/2021	Leslie Palmer	Review and edit PI Discovery Resp	\$400.00	0.2	\$80.00
11/02/2021	Leslie Palmer	Review and edit PI Dis to HMMA	\$400.00	0.1	\$40.00
11/02/2021	Leslie Palmer	1 email sent/reviewed regarding discovery draft	\$400.00	0.1	\$40.00
11/08/2021	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
11/09/2021	Leslie Palmer	1 email sent/reviewed regarding Your call	\$400.00	0.1	\$40.00
11/10/2021	Leslie Palmer	call with clt RE: discovery	\$400.00	0.2	\$80.00
11/10/2021	Leslie Palmer	1 email sent/reviewed regarding Discovery Questions	\$400.00	0.1	\$40.00
11/12/2021	Leslie Palmer	4 email sent/reviewed regarding additional information, answers, 2017 applications, Key IROG answers	\$400.00	0.1	\$40.00
11/19/2021	Leslie Palmer	Review and analyze list created by HL of wit to depose	\$400.00	0.1	\$40.00
11/19/2021	Leslie Palmer	Travel from MTG for scheduling	\$400.00	1.5	\$600.00

		conference			
11/19/2021	Leslie Palmer	Scheduling Conference	\$400.00	1.4	\$560.00
11/19/2021	Leslie Palmer	Travel to MTG for Scheduling Conference	\$400.00	1.5	\$600.00
11/19/2021	Leslie Palmer	2 email sent/reviewed regarding Witnesses to depose	\$400.00	0.1	\$40.00
11/19/2021	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
11/24/2021	Leslie Palmer	1 email sent/reviewed regarding Documents	\$400.00	0.1	\$40.00
11/29/2021	Leslie Palmer	Review and analyze pleading comparison.	\$400.00	0.2	\$80.00
11/29/2021	Leslie Palmer	2 email sent/reviewed regarding Documents	\$400.00	0.1	\$40.00
11/30/2021	Leslie Palmer	1 email sent/reviewed regarding pleading comparison	\$400.00	0.1	\$40.00
11/30/2021	Leslie Palmer	Review and analyze pleading comparison	\$400.00	0.2	\$80.00
12/01/2021	Leslie Palmer	3 email sent/reviewed regarding request for extension to respond to discovery	\$400.00	0.1	\$40.00
12/02/2021	Leslie Palmer	3 email sent/reviewed regarding Information	\$400.00	0.1	\$40.00
12/03/2021	Leslie Palmer	18 email sent/reviewed regarding case e-mails and evidence forwarded from Plaintiff	\$400.00	0.3	\$120.00
12/03/2021	Leslie Palmer	Documents forwarded for Plaintiff reviewed and analyzed for production	\$400.00	0.3	\$120.00
12/04/2021	Leslie Palmer	PI Resp to HMMA RFP	\$400.00	1.5	\$600.00
12/04/2021	Leslie Palmer	1 email sent/reviewed regarding Information	\$400.00	0.1	\$40.00
12/06/2021	Leslie Palmer	PI Resp to HMMA - Supplement	\$400.00	0.2	\$80.00
12/06/2021	Leslie Palmer	13 email sent/reviewed regarding Case, Photos, IROG Resp, Taxes, Signature,	\$400.00	0.2	\$80.00
12/07/2021	Leslie Palmer	8 email sent/reviewed regarding IROG Response, PI Discovery Resp, Production	\$400.00	0.2	\$80.00
12/08/2021	Leslie Palmer	2 email sent/reviewed regarding draft discovery to Dynamic	\$400.00	0.1	\$40.00
12/09/2021	Leslie Palmer	Review and analyze documents received from HMMA	\$400.00	0.8	\$320.00
12/09/2021	Leslie Palmer	12 email sent/reviewed regarding Obj to HMMA Designation as confidential, Draft HMMA 30b6, Identities of complaining parties redacted, PI discovery request to Dynamic, Draft discovery to Dynamic, HEA insurance coverage	\$400.00	0.2	\$80.00
12/10/2021	Leslie Palmer	8 email sent/reviewed regarding obj to HMMAs designation of documents as confidential, Dynamic Security Handbook, PI discovery Response, HMMA supplemental document production	\$400.00	0.2	\$80.00

12/11/2021	Leslie Palmer	1 email sent/reviewed regarding handbooks	\$400.00	0.1	\$40.00
12/13/2021	Leslie Palmer	6 email sent/reviewed regarding Handbooks, discovery requests to HEA, PI Discovery Resp, HEA insurance coverage, KEY	\$400.00	0.1	\$40.00
12/17/2021	Leslie Palmer	2 email sent/reviewed regarding Key	\$400.00	0.1	\$40.00
12/20/2021	Leslie Palmer	1 email sent/reviewed regarding Davita Key v HMMA et al	\$400.00	0.1	\$40.00
12/28/2021	Leslie Palmer	1 email sent/reviewed regarding PI Discovery Resp	\$400.00	0.1	\$40.00
12/31/2021	Leslie Palmer	2 email sent/reviewed regarding PI Discovery Req to Dynamic, PI Discovery Resp	\$400.00	0.1	\$40.00
01/04/2022	Leslie Palmer	2 email sent/reviewed regarding PI discovery request to Dynamic, PI Discovery Resp	\$400.00	0.1	\$40.00
01/08/2022	Leslie Palmer	1 email sent/reviewed regarding Key v HMMA, Dynamic, HEA	\$400.00	0.1	\$40.00
01/10/2022	Leslie Palmer	Call with HL Re: discovery deficiencies	\$400.00	0.2	\$80.00
01/10/2022	Leslie Palmer	9 email sent/reviewed regarding addresses needed, letter, PI discovery responses	\$400.00	0.2	\$80.00
01/12/2022	Leslie Palmer	Supplement to PI Resp to HMMA Discovery	\$400.00	0.4	\$160.00
01/12/2022	Leslie Palmer	3 email sent/reviewed regarding Draft Rule 37 to Dynamic, Dynamic Objections to PI Discovery, PI Discovery Resp	\$400.00	0.1	\$40.00
01/13/2022	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
01/14/2022	Leslie Palmer	Supp to RFP HMMA	\$400.00	0.6	\$240.00
01/14/2022	Leslie Palmer	4 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
01/14/2022	Leslie Palmer	2 email sent/reviewed regarding HMMA supplemental response, PL IROG	\$400.00	0.1	\$40.00
01/18/2022	Leslie Palmer	3 email sent/reviewed regarding Dynamics discovery responses	\$400.00	0.1	\$40.00
01/24/2022	Leslie Palmer	3 email sent/reviewed regarding Dynamic discovery responses, documents	\$400.00	0.1	\$40.00
01/24/2022	Leslie Palmer	3 email sent/reviewed regarding documents, Dynamic Discovery Responses	\$400.00	0.1	\$40.00
01/25/2022	Leslie Palmer	2nd supp to HMMA RFP	\$400.00	0.2	\$80.00
01/25/2022	Leslie Palmer	Review and analyze discovery response by Dynamic	\$400.00	1.8	\$720.00
01/25/2022	Leslie Palmer	call with HL Re Dynamic discovery responses	\$400.00	0.1	\$40.00
01/25/2022	Leslie Palmer	2 email sent/reviewed regarding Documents, PI Supplemental Discovery Resp	\$400.00	0.1	\$40.00
01/27/2022	Leslie Palmer	3 email sent/reviewed regarding	\$400.00	0.1	\$40.00

		Key v HMMA, Dynamic Security and HEA			
01/28/2022	Leslie Palmer	Damages calculation, supplemental response to HMMA IROG, Email to all counsel with documents attached, Call with HL to discuss, Call with Client to discuss.	\$400.00	5.5	\$2,200.00
01/28/2022	Leslie Palmer	Amd PI Initial Disclosures	\$400.00	0.2	\$80.00
01/28/2022	Leslie Palmer	updated backpay charts	\$400.00	0.4	\$160.00
01/28/2022	Leslie Palmer	PI Resp to HMMA Disc Amd	\$400.00	0.2	\$80.00
01/28/2022	Leslie Palmer	7 email sent/reviewed regarding PI Supplemental Discovery Resp	\$400.00	0.1	\$40.00
01/31/2022	Leslie Palmer	E-mail documents from HMMA Re: plaintiff depo reviewed, saved	\$400.00	0.1	\$40.00
02/04/2022	Leslie Palmer	1 email sent/reviewed regarding Response to PI 1st Discovery	\$400.00	0.1	\$40.00
02/06/2022	Leslie Palmer	1 email sent/reviewed regarding Information	\$400.00	0.1	\$40.00
02/08/2022	Leslie Palmer	3 email sent/reviewed regarding Employment	\$400.00	0.1	\$40.00
02/10/2022	Leslie Palmer	1 email sent/reviewed regarding letter to counsel regarding scheduling deposition	\$400.00	0.1	\$40.00
02/14/2022	Leslie Palmer	5 email sent/reviewed regarding deposition of Plaintiff	\$400.00	0.1	\$40.00
02/17/2022	Leslie Palmer	12 email sent/reviewed regarding responses, haven't forgotten about you, Draft Plaintiff's answers to discovery, HEAs discovery to PI,	\$400.00	0.2	\$80.00
02/18/2022	Leslie Palmer	5 email sent/reviewed regarding Responses, haven't forgotten about you	\$400.00	0.1	\$40.00
02/21/2022	Leslie Palmer	4 email sent/reviewed regarding haven't forgotten about you.	\$400.00	0.1	\$40.00
02/22/2022	Leslie Palmer	1 email sent/reviewed regarding haven't forgotten about you.	\$400.00	0.1	\$40.00
02/23/2022	Leslie Palmer	3 email sent/reviewed regarding Case update	\$400.00	0.1	\$40.00
02/24/2022	Leslie Palmer	6 email sent/reviewed regarding Key deposition scheduling	\$400.00	0.1	\$40.00
02/25/2022	Leslie Palmer	1 email sent/reviewed regarding scheduling Key's deposition	\$400.00	0.1	\$40.00
02/28/2022	Leslie Palmer	2 email sent/reviewed regarding question, scheduling deposition of PI	\$400.00	0.1	\$40.00
03/01/2022	Leslie Palmer	2 email sent/reviewed regarding draft discovery responses, question	\$400.00	0.1	\$40.00
03/04/2022	Leslie Palmer	Review and analyze Dynamic discovery responses, compare with documents received. Combine objections and responses for Rule 37 Letter. Begin to draft letter.	\$400.00	2.1	\$840.00
03/07/2022	Leslie Palmer	Update Dynamic Document index to represent documents received to date. Review and analyze documents received to date for responsiveness to discovery	\$400.00	4.2	\$1,680.00

		requests. Complete discovery deficiency letter. E-mail letter to Dynamic defense counsel with CC: to HL.			
03/09/2022	Leslie Palmer	2 email sent/reviewed regarding Rule 37 letter, PI tax	\$400.00	0.1	\$40.00
03/10/2022	Leslie Palmer	Review and analyze discovery responses received from Def. HEA and prepare to draft a Rule 37 Letter.	\$400.00	3.7	\$1,480.00
03/10/2022	Leslie Palmer	3 email sent/reviewed regarding Rule 37 letter, PI Production	\$400.00	0.1	\$40.00
03/11/2022	Leslie Palmer	1 email sent/reviewed regarding dynamic security / key	\$400.00	0.1	\$40.00
03/14/2022	Leslie Palmer	Taxes for 2017 - 2020 reviewed, redacted and produced to Defendants.	\$400.00	1.3	\$520.00
03/14/2022	Leslie Palmer	1 email sent/reviewed regarding updated production	\$400.00	0.1	\$40.00
03/15/2022	Leslie Palmer	1 email sent/reviewed regarding Work	\$400.00	0.1	\$40.00
03/16/2022	Leslie Palmer	Drafting Rule 37 Letter to HEA. E-mailed to HEA counsel Miller and Bond with CC to HL	\$400.00	2.7	\$1,080.00
03/16/2022	Leslie Palmer	1 email sent/reviewed regarding Rule 37 Letter	\$400.00	0.1	\$40.00
03/18/2022	Leslie Palmer	Draft PI Resp to Discovery from HEA	\$400.00	2.5	\$1,000.00
03/18/2022	Leslie Palmer	Draft responses to HEA discovery requests. Multiple communications with client through the drafting via e-mail.	\$400.00	2.3	\$920.00
03/18/2022	Leslie Palmer	2 email sent/reviewed regarding Dynamic rule 37	\$400.00	0.1	\$40.00
03/18/2022	Leslie Palmer	13 email sent/reviewed regarding PI discovery documents	\$400.00	0.1	\$40.00
03/21/2022	Leslie Palmer	7 email sent/reviewed regarding Dynamic Rule 37 letter, Response to HEA discovery, Draft answers, discovery requests, Dynamic discovery requests, PI discovery responses.	\$400.00	0.1	\$40.00
03/22/2022	Leslie Palmer	4 email sent/reviewed regarding HEA, update from client, meeting, subpoena notice	\$400.00	0.1	\$40.00
03/24/2022	Leslie Palmer	1 email sent/reviewed regarding discovery signature, meeting	\$400.00	0.1	\$40.00
03/25/2022	Leslie Palmer	Planning and status call with HL. Discussed, extensions, discovery, issues with cell phone produced.	\$400.00	0.9	\$360.00
03/25/2022	Leslie Palmer	8 email sent/reviewed regarding Dynamic / Key, Documents shared, plaintiff's motion to amend scheduling order, Phone	\$400.00	0.1	\$40.00
03/27/2022	Leslie Palmer	3 email sent/reviewed regarding Phone	\$400.00	0.1	\$40.00
03/27/2022	Leslie Palmer	2 email sent/reviewed regarding	\$400.00	0.1	\$40.00

		Key v Hyundai, Plaintiff's motion to amend scheduling order			
03/28/2022	Leslie Palmer	5 email sent/reviewed regarding Plaintiff motion to Amend scheduling order	\$400.00	0.1	\$40.00
03/28/2022	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
03/29/2022	Leslie Palmer	Draft PL discovery response to Dynamic	\$400.00	1.8	\$720.00
03/30/2022	Leslie Palmer	Call with all counsel to discuss deposition dates and ESI issues	\$400.00	0.4	\$160.00
03/30/2022	Leslie Palmer	Call with HL to discuss ESI issues	\$400.00	0.3	\$120.00
03/30/2022	Leslie Palmer	4 email sent/reviewed regarding PI Motion to Amend Scheduling Order	\$400.00	0.1	\$40.00
03/31/2022	Leslie Palmer	1 email sent/reviewed regarding Plaintiff's motion to Amd scheduling order	\$400.00	0.1	\$40.00
04/01/2022	Leslie Palmer	1 email sent/reviewed regarding deposition of Davita Key	\$400.00	0.1	\$40.00
04/04/2022	Leslie Palmer	4 email sent/reviewed regarding follow up on deposition scheduling	\$400.00	0.1	\$40.00
04/05/2022	Leslie Palmer	5 email sent/reviewed regarding Employment, 30b6 to HEA, 30b6 to HMMA	\$400.00	0.1	\$40.00
04/06/2022	Leslie Palmer	1 email sent/reviewed regarding Employment update	\$400.00	0.1	\$40.00
04/08/2022	Leslie Palmer	Draft response to Dynamic discovery questions. Phone call with Client RE: responses.	\$400.00	2.8	\$1,120.00
04/08/2022	Leslie Palmer	3 email sent/reviewed regarding employment update, HMMA 30b6	\$400.00	0.1	\$40.00
04/11/2022	Leslie Palmer	4 email sent/reviewed regarding HMMA 30b6, PL Discovery response, Dynamic Response to Interrogatory	\$400.00	0.1	\$40.00
04/12/2022	Leslie Palmer	1 email sent/reviewed regarding HMMA 30b6	\$400.00	0.1	\$40.00
04/12/2022	Leslie Palmer	4 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
04/13/2022	Leslie Palmer	2 email sent/reviewed regarding HMMA 30b6, Dynamic Suing Hargrove	\$400.00	0.1	\$40.00
04/15/2022	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
04/15/2022	Leslie Palmer	3 email sent/reviewed regarding dynamic 30b6 notice, hmma 30b6,	\$400.00	0.1	\$40.00
04/19/2022	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
04/21/2022	Leslie Palmer	12 email sent/reviewed regarding Dynamic 30b6 notice, Motion and Memo in support of EEOC motion to Quash, NDAL docket entries for EEOC subpoena, notes on phone.	\$400.00	0.2	\$80.00
04/22/2022	Leslie Palmer	Telephone hearing RE: EEOC motion to quash subpoena	\$400.00	0.8	\$320.00
04/25/2022	Leslie Palmer	Phone call with HL RE: last week's	\$400.00	0.6	\$240.00

		conference, outstanding discovery, and strategy moving forward			
04/25/2022	Leslie Palmer	2 email sent/reviewed regarding research on EEOC errors	\$400.00	0.1	\$40.00
04/25/2022	Leslie Palmer	Research on EEOC processing errors	\$400.00	1.7	\$680.00
05/04/2022	Leslie Palmer	Counsel all call RE: planning	\$400.00	0.2	\$80.00
05/04/2022	Leslie Palmer	1 email sent/reviewed regarding HEA Resp and objection to 30b6	\$400.00	0.1	\$40.00
05/09/2022	Leslie Palmer	1 email sent/reviewed regarding D. Key v. HMMA et al	\$400.00	0.1	\$40.00
05/10/2022	Leslie Palmer	1 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00
05/11/2022	Leslie Palmer	3 email sent/reviewed regarding Dynamic Production, access and download to file	\$400.00	0.2	\$80.00
05/12/2022	Leslie Palmer	8 email sent/reviewed regarding Followup on Deposition Scheduling, Case Update	\$400.00	0.1	\$40.00
05/13/2022	Leslie Palmer	1 email sent/reviewed regarding D. Key v. HMMA at al	\$400.00	0.1	\$40.00
05/16/2022	Leslie Palmer	2 email sent/reviewed regarding Key Deposition and Prep	\$400.00	0.1	\$40.00
05/23/2022	Leslie Palmer	3 email sent/reviewed regarding Dynamic Security Objection to 30b6 notice, discovery letter and documents	\$400.00	0.1	\$40.00
05/24/2022	Leslie Palmer	6 email sent/reviewed regarding NELA-AL Reinstating Previously Dismissed Claim	\$400.00	0.1	\$40.00
05/26/2022	Leslie Palmer	1 email sent/reviewed regarding Key v HMMA, HEA & Dynamic	\$400.00	0.1	\$40.00
06/02/2022	Leslie Palmer	1 email sent/reviewed regarding Voicemail from Lehr	\$400.00	0.1	\$40.00
06/03/2022	Leslie Palmer	Review, analyze, and index documents, call with HL RE: depositions and deposition prep E-mail doc indexes to HL	\$400.00	5.4	\$2,160.00
06/03/2022	Leslie Palmer	4 email sent/reviewed regarding Key	\$400.00	0.1	\$40.00
06/06/2022	Leslie Palmer	2 email sent/reviewed regarding Key	\$400.00	0.1	\$40.00
06/08/2022	Leslie Palmer	1 email sent/reviewed regarding pay information	\$400.00	0.1	\$40.00
06/09/2022	Leslie Palmer	1 email sent/reviewed regarding conference room scheduling	\$400.00	0.1	\$40.00
06/10/2022	Leslie Palmer	3 email sent/reviewed regarding conference room scheduling	\$400.00	0.1	\$40.00
06/13/2022	Leslie Palmer	E-mail to Def. Counsel RE: HMMA deposition update with location and need to reschedule other defendant corporate reps.	\$400.00	0.1	\$40.00
06/13/2022	Leslie Palmer	Call with HL RE: depositions and status.	\$400.00	0.2	\$80.00
06/13/2022	Leslie Palmer	New folder created and link sent to CLT re: all documents produced for	\$400.00	0.3	\$120.00

		review before deposition.			
06/13/2022	Leslie Palmer	7 email sent/reviewed regarding Conference room scheduling, HMMA 30b6 notice and documents produced	\$400.00	0.1	\$40.00
06/14/2022	Leslie Palmer	3 email sent/reviewed regarding all documents produced, Key deposition	\$400.00	0.1	\$40.00
06/16/2022	Leslie Palmer	2 email sent/reviewed regarding deposition on Monday June 20	\$400.00	0.1	\$40.00
06/19/2022	Leslie Palmer	7 email sent/reviewed regarding covid exposure, HMMA depo notice, Key deposition	\$400.00	0.1	\$40.00
06/20/2022	Leslie Palmer	Travel from Montgomery - Plaintiff Deposition	\$400.00	2	\$800.00
06/20/2022	Leslie Palmer	Travel to Montgomery for deposition of Plaintiff.	\$400.00	2	\$800.00
06/20/2022	Leslie Palmer	Deposition of Plaintiff	\$400.00	7.5	\$3,000.00
06/21/2022	Leslie Palmer	E-mail to confirm court reporter and provide directions.	\$400.00	0.1	\$40.00
06/21/2022	Leslie Palmer	Download and review HL documents for HMMA 30b6 deposition.	\$400.00	0.2	\$80.00
06/21/2022	Leslie Palmer	17 email sent/reviewed regarding deposition scheduling confirmation, deposition of corporate rep, case update, deposition parking, deposition	\$400.00	0.2	\$80.00
06/22/2022	Leslie Palmer	3 email sent/reviewed regarding deposition of corporate rep	\$400.00	0.1	\$40.00
06/23/2022	Leslie Palmer	1 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00
06/24/2022	Leslie Palmer	3 email sent/reviewed regarding case update and pictures	\$400.00	0.1	\$40.00
06/25/2022	Leslie Palmer	2 email sent/reviewed regarding Pictures	\$400.00	0.1	\$40.00
06/27/2022	Leslie Palmer	2 email sent/reviewed regarding hair pictures	\$400.00	0.1	\$40.00
06/28/2022	Leslie Palmer	1 email sent/reviewed regarding employment update	\$400.00	0.1	\$40.00
07/07/2022	Leslie Palmer	2 email sent/reviewed regarding case update and smokeball communication	\$400.00	0.1	\$40.00
07/08/2022	Leslie Palmer	1 email sent/reviewed regarding wsfa article RE director lawsuit	\$400.00	0.1	\$40.00
07/11/2022	Leslie Palmer	3 email sent/reviewed regarding wsfa article Hyundai articles, Key depo summary,	\$400.00	0.1	\$40.00
07/12/2022	Leslie Palmer	1 email sent/reviewed regarding Hair Discrimination Research Memo	\$400.00	0.1	\$40.00
07/20/2022	Leslie Palmer	1 email sent/reviewed regarding Deposition dates	\$400.00	0.1	\$40.00
07/22/2022	Leslie Palmer	6 email sent/reviewed regarding deposition dates and HMMA depo summary	\$400.00	0.1	\$40.00
07/25/2022	Leslie Palmer	2 email sent/reviewed regarding	\$400.00	0.1	\$40.00

		case update			
07/28/2022	Leslie Palmer	1 email sent/reviewed regarding HMMA deposition transcript	\$400.00	0.1	\$40.00
07/29/2022	Leslie Palmer	3 email sent/reviewed regarding deposition dates	\$400.00	0.1	\$40.00
08/01/2022	Leslie Palmer	1 email sent/reviewed regarding wsfa.com article	\$400.00	0.1	\$40.00
08/05/2022	Leslie Palmer	Call with Potential Wit N.S.	\$400.00	0.8	\$320.00
08/05/2022	Leslie Palmer	Draft and e-mail declaration to Potential Wit. N.S.	\$400.00	0.8	\$320.00
08/05/2022	Leslie Palmer	1 email sent/reviewed regarding Scavella Statement	\$400.00	0.1	\$40.00
08/08/2022	Leslie Palmer	15 email sent/reviewed regarding Deposition dates	\$400.00	0.2	\$80.00
08/09/2022	Leslie Palmer	7 email sent/reviewed regarding case update, amended initial disclosures, Cureton depo notice, Key v Dynamic Security	\$400.00	0.1	\$40.00
08/10/2022	Leslie Palmer	Call with client to discuss potential settlement with Dynamic.	\$400.00	0.6	\$240.00
08/10/2022	Leslie Palmer	7 email sent/reviewed regarding Cureton video deposition scheduling, HMMA post depo deficiency, damages	\$400.00	0.1	\$40.00
08/11/2022	Leslie Palmer	1 email sent/reviewed regarding Draft Settlement Letter for Review	\$400.00	0.1	\$40.00
08/12/2022	Leslie Palmer	Amd Initial Disclosures	\$400.00	0.1	\$40.00
08/12/2022	Leslie Palmer	2 email sent/reviewed regarding updated damages spreadsheet	\$400.00	0.1	\$40.00
08/12/2022	Leslie Palmer	Updated damages calculations and document index	\$400.00	0.4	\$160.00
08/15/2022	Leslie Palmer	11 email sent/reviewed regarding HEA 30b6, Scheduling, Case update, Damages spreadsheet	\$400.00	0.2	\$80.00
08/16/2022	Leslie Palmer	1 email sent/reviewed regarding deposition	\$400.00	0.1	\$40.00
08/17/2022	Leslie Palmer	deposition prep	\$400.00	2.7	\$1,080.00
08/17/2022	Leslie Palmer	4 email sent/reviewed regarding dynamic 30b6 deposition	\$400.00	0.1	\$40.00
08/18/2022	Leslie Palmer	deposition prep	\$400.00	4.3	\$1,720.00
08/18/2022	Leslie Palmer	17 email sent/reviewed regarding Dynamic 30b6 notice, amended objections, deposition exhibits, deposition scheduling	\$400.00	0.2	\$80.00
08/19/2022	Leslie Palmer	Preparation for deposition	\$400.00	1.9	\$760.00
08/19/2022	Leslie Palmer	Close out work on dynamic depo - including uploading exhibits to court reporter portal	\$400.00	1.4	\$560.00
08/19/2022	Leslie Palmer	Deposition of Dynamic rep	\$400.00	7.5	\$3,000.00
08/19/2022	Leslie Palmer	12 email sent/reviewed regarding Dynamic production, williams deposition, hea production, cureton scheduling, ND subpoena filings, Dynamic	\$400.00	0.2	\$80.00
08/19/2022	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00

08/22/2022	Leslie Palmer	Hearing on Motion to Quash	\$400.00	0.8	\$320.00
08/22/2022	Leslie Palmer	8 email sent/reviewed regarding amendments and deposition notices and scheduling	\$400.00	0.1	\$40.00
08/22/2022	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
08/23/2022	Leslie Palmer	11 email sent/reviewed regarding Cureton deposition	\$400.00	0.1	\$40.00
08/24/2022	Leslie Palmer	Draft and file NOA for NDAL EEOC Subpoena Case	\$400.00	0.2	\$80.00
08/24/2022	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
08/24/2022	Leslie Palmer	15 email sent/reviewed regarding Cureton deposition	\$400.00	0.1	\$40.00
08/26/2022	Leslie Palmer	2 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00
08/26/2022	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
08/29/2022	Leslie Palmer	Ray Cureton Deposition Prep	\$400.00	3.7	\$1,480.00
08/29/2022	Leslie Palmer	1 email sent/reviewed regarding deposition scheduling	\$400.00	0.1	\$40.00
08/30/2022	Leslie Palmer	Deposition prep, and deposition of Ray Cureton.	\$400.00	5	\$2,000.00
08/30/2022	Leslie Palmer	1 email sent/reviewed regarding Dynamic 30b6 Exhibits	\$400.00	0.1	\$40.00
08/31/2022	Leslie Palmer	1 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00
09/01/2022	Leslie Palmer	1 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00
09/02/2022	Leslie Palmer	5 email sent/reviewed regarding settlement conference and dynamic production	\$400.00	0.1	\$40.00
09/02/2022	Leslie Palmer	1 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00
09/02/2022	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
09/05/2022	Leslie Palmer	Research agency issue in employment and liability	\$400.00	0.7	\$280.00
09/06/2022	Leslie Palmer	Travel to HEA Deposition	\$400.00	2	\$800.00
09/06/2022	Leslie Palmer	HEA deposition	\$400.00	3.7	\$1,480.00
09/06/2022	Leslie Palmer	1 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00
09/07/2022	Leslie Palmer	Travel from HEA deposition	\$400.00	2	\$800.00
09/07/2022	Leslie Palmer	2 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00
09/07/2022	Leslie Palmer	4 email sent/reviewed regarding Notice concerning settlement	\$400.00	0.1	\$40.00
09/08/2022	Leslie Palmer	Research for cases RE: receipt of right to sue question of fact.	\$400.00	0.7	\$280.00
09/08/2022	Leslie Palmer	Call with DOL to confirm hearing transcript coming.	\$400.00	0.1	\$40.00
09/12/2022	Leslie Palmer	Received and reviewed unemployment hearing recording. E-mail to HL RE: disclosure and transcription.	\$400.00	1.1	\$440.00

09/12/2022	Leslie Palmer	1 email sent/reviewed regarding Key unemployment hearing	\$400.00	0.1	\$40.00
09/13/2022	Leslie Palmer	E-mail to all counsel RE: disclosure of unemployment recording. E-mail to court reporter.	\$400.00	0.3	\$120.00
09/13/2022	Leslie Palmer	Call with HL RE: next steps RE: recording, transcription, and new disclosures.	\$400.00	0.2	\$80.00
09/13/2022	Leslie Palmer	2 email sent/reviewed regarding update and case documents	\$400.00	0.1	\$40.00
09/14/2022	Leslie Palmer	Supplemental production redacted, bates labeled and e-mailed	\$400.00	0.3	\$120.00
09/14/2022	Leslie Palmer	2 email sent/reviewed regarding unemployment hearing transcription	\$400.00	0.1	\$40.00
09/15/2022	Leslie Palmer	1 email sent/reviewed regarding Notice concerning settlement	\$400.00	0.1	\$40.00
09/15/2022	Leslie Palmer	1 email sent/reviewed regarding unemployment transcript	\$400.00	0.1	\$40.00
09/15/2022	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entires	\$400.00	0.1	\$40.00
09/16/2022	Leslie Palmer	Download and Review EEOC's opposition to proposed deposition questions	\$400.00	0.2	\$80.00
09/16/2022	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
09/19/2022	Leslie Palmer	Pull last court order to calendar dates for dispositive motions and responses.	\$400.00	0.6	\$240.00
09/21/2022	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
09/23/2022	Leslie Palmer	1 email sent/reviewed regarding communicate message smokeball	\$400.00	0.1	\$40.00
09/25/2022	Leslie Palmer	1 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00
09/28/2022	Leslie Palmer	5 email sent/reviewed regarding cite depos transcripts of dynamic security and unemployment hearing with invoices	\$400.00	0.2	\$80.00
10/02/2022	Leslie Palmer	email sent/reviewed regarding C Williams Deposition	\$400.00	0.1	\$40.00
10/02/2022	Leslie Palmer	1 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00
10/03/2022	Leslie Palmer	1 email sent/reviewed regarding Communicate message smokeball	\$400.00	0.1	\$40.00
10/11/2022	Leslie Palmer	1 email sent/reviewed regarding Spires Deposition Summary	\$400.00	0.1	\$40.00
10/11/2022	Leslie Palmer	1 email sent/reviewed regarding Key v HMMA	\$400.00	0.1	\$40.00
10/12/2022	Leslie Palmer	Download and save CMECF documents for HMMA MSJ	\$400.00	0.7	\$280.00
10/12/2022	Leslie Palmer	Conference with HL RE: HMMA MSJ and request for supplementation.	\$400.00	0.2	\$80.00
10/12/2022	Leslie Palmer	Download and save documents RE: HEA MSJ	\$400.00	0.8	\$320.00
10/12/2022	Leslie Palmer	11 email sent/reviewed regarding	\$400.00	0.2	\$80.00

		activity in case docket entries			
10/12/2022	Leslie Palmer	5 email sent/reviewed regarding HEA HMMA and summary judgment filings	\$400.00	0.1	\$40.00
10/13/2022	Leslie Palmer	Download and Save Dynamic MSJ documents	\$400.00	1.2	\$480.00
10/13/2022	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
10/13/2022	Leslie Palmer	4 email sent/reviewed regarding HMMA Motion for Summary Judgment	\$400.00	0.1	\$40.00
10/13/2022	Leslie Palmer	Conference with HL RE: Key Update	\$400.00	0.2	\$80.00
10/18/2022	Leslie Palmer	1 email sent/reviewed regarding MSJ draft	\$400.00	0.1	\$40.00
10/18/2022	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
10/19/2022	Leslie Palmer	3 email sent/reviewed regarding answers Transcript files of Sherry Spires and Kristal Riddle	\$400.00	0.1	\$40.00
10/20/2022	Leslie Palmer	Teams meeting with client and HL RE: summary judgment	\$400.00	0.8	\$320.00
10/20/2022	Leslie Palmer	Review and analyze client response to MSJ facts.	\$400.00	2.2	\$880.00
10/20/2022	Leslie Palmer	1 email sent/reviewed regarding Answers	\$400.00	0.1	\$40.00
10/20/2022	Leslie Palmer	2 email sent/reviewed regarding Sherry Spires deposition transcript	\$400.00	0.1	\$40.00
10/23/2022	Leslie Palmer	Review and analyze deposition transcripts for MSJ response	\$400.00	2.3	\$920.00
10/24/2022	Leslie Palmer	Drafting MSJ	\$400.00	2.1	\$840.00
10/24/2022	Leslie Palmer	1 email sent/reviewed regarding opposition to motion to supplement	\$400.00	0.1	\$40.00
10/25/2022	Leslie Palmer	Drafting MSJ	\$400.00	1.7	\$680.00
10/25/2022	Leslie Palmer	2 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00
10/25/2022	Leslie Palmer	1 email sent/reviewed regarding Kristal Riddle Deposition Transcript	\$400.00	0.1	\$40.00
10/25/2022	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
10/26/2022	Leslie Palmer	Drafting MSJ	\$400.00	4.8	\$1,920.00
10/27/2022	Leslie Palmer	Drafting MSJ Response	\$400.00	8.7	\$3,480.00
10/27/2022	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
10/27/2022	Leslie Palmer	1 email sent/reviewed regarding citation checks	\$400.00	0.1	\$40.00
10/28/2022	Leslie Palmer	MSJ Response drafting	\$400.00	5.3	\$2,120.00
10/28/2022	Leslie Palmer	1 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00
10/28/2022	Leslie Palmer	Review and Analyze Defendants MSJ briefs for outlining response.	\$400.00	1.7	\$680.00
10/29/2022	Leslie Palmer	Research joint employer and administrative exhaustion	\$400.00	3.7	\$1,480.00
10/29/2022	Leslie Palmer	Drafting MSJ Response.	\$400.00	4	\$1,600.00
10/30/2022	Leslie Palmer	2 email sent/reviewed regarding	\$400.00	0.1	\$40.00

		draft MSJ			
10/30/2022	Leslie Palmer	Drafting MSJ response.	\$400.00	5.2	\$2,080.00
10/31/2022	Leslie Palmer	Drafting MSJ Response	\$400.00	7	\$2,800.00
10/31/2022	Leslie Palmer	2 email sent/reviewed regarding MSJ Draft	\$400.00	0.1	\$40.00
11/01/2022	Leslie Palmer	Draft MSJ Response	\$400.00	5.3	\$2,120.00
11/01/2022	Leslie Palmer	Draft MSJ Affidavit	\$400.00	2.4	\$960.00
11/01/2022	Leslie Palmer	1 email sent/reviewed regarding Draft Declaration	\$400.00	0.1	\$40.00
11/02/2022	Leslie Palmer	Review HL Edits to MSJ Opposition	\$400.00	1.2	\$480.00
11/02/2022	Leslie Palmer	1 email sent/reviewed regarding MSJ Brief	\$400.00	0.1	\$40.00
11/02/2022	Leslie Palmer	1 email sent/reviewed regarding Draft Declaration	\$400.00	0.1	\$40.00
11/03/2022	Leslie Palmer	Edits and modifications to MSJ Draft. Finalize filing. Finalize Declaration. File MSJ Opposition.	\$400.00	10.2	\$4,080.00
11/03/2022	Leslie Palmer	email sent/reviewed regarding MSJ edits	\$400.00	0.1	\$40.00
11/03/2022	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
11/03/2022	Leslie Palmer	1 email sent/reviewed regarding Affidavit	\$400.00	0.1	\$40.00
11/04/2022	Leslie Palmer	Download and save all filed documents from MSJ and forward to client for her file.	\$400.00	0.3	\$120.00
11/09/2022	Leslie Palmer	3 email sent/reviewed regarding consent for extension by Dynamic	\$400.00	0.1	\$40.00
11/09/2022	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
11/10/2022	Leslie Palmer	2 email sent/reviewed regarding activity in case	\$400.00	0.1	\$40.00
11/10/2022	Leslie Palmer	3 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
11/14/2022	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
11/15/2022	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
11/30/2022	Leslie Palmer	4 email sent/reviewed regarding Hyundai plant and case update	\$400.00	0.1	\$40.00
01/05/2023	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
01/05/2023	Leslie Palmer	1 email sent/reviewed regarding communicate message smokeball	\$400.00	0.1	\$40.00
01/05/2023	Leslie Palmer	Download and save CM/ECF Documents to file.	\$400.00	0.4	\$160.00
01/06/2023	Leslie Palmer	Email from CLT checking status	\$400.00	0.1	\$40.00
01/06/2023	Leslie Palmer	1 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00
01/09/2023	Leslie Palmer	E-mail to Clt RE: Status	\$400.00	0.1	\$40.00
01/09/2023	Leslie Palmer	Call with HL RE: Pretrial Order	\$400.00	0.1	\$40.00
01/09/2023	Leslie Palmer	pretrial order	\$400.00	0.1	\$40.00
01/09/2023	Leslie Palmer	1 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00

01/10/2023	Leslie Palmer	Review HL Draft of Pretrial Order	\$400.00	0.2	\$80.00
01/12/2023	Leslie Palmer	4 email sent/reviewed regarding pretrial order	\$400.00	0.1	\$40.00
01/16/2023	Leslie Palmer	Research waiver of jury trial	\$400.00	0.4	\$160.00
01/17/2023	Leslie Palmer	Drafting response to motion to strike jury demand	\$400.00	5.3	\$2,120.00
01/17/2023	Leslie Palmer	5 email sent/reviewed regarding Key v HMMA, HEA and Dynamic	\$400.00	0.1	\$40.00
01/18/2023	Leslie Palmer	Draft Resp to Motion to strike jury and prepare exhibits.	\$400.00	4.3	\$1,720.00
01/18/2023	Leslie Palmer	Call with HL RE: motion to strike jury.	\$400.00	0.2	\$80.00
01/18/2023	Leslie Palmer	2 email sent/reviewed regarding Dynamic mtn to strike jury	\$400.00	0.1	\$40.00
01/19/2023	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
01/19/2023	Leslie Palmer	3 email sent/reviewed regarding pretrial order	\$400.00	0.1	\$40.00
01/21/2023	Leslie Palmer	Draft pre-trial documents, Witness list, exhibit list	\$400.00	1.4	\$560.00
01/22/2023	Leslie Palmer	Drafting Exhibit list	\$400.00	3.7	\$1,480.00
01/22/2023	Leslie Palmer	Create document tracking deposition exhibits to proposed trial exhibits.	\$400.00	0.7	\$280.00
01/23/2023	Leslie Palmer	Pretrial Documents - Witness and Exhibit Lists	\$400.00	6.4	\$2,560.00
01/23/2023	Leslie Palmer	Review of edits to proposed pretrial order	\$400.00	0.3	\$120.00
01/23/2023	Leslie Palmer	1 email sent/reviewed regarding pretrial order	\$400.00	0.1	\$40.00
01/24/2023	Leslie Palmer	Call with all counsel RE: joint pretrial order	\$400.00	0.3	\$120.00
01/24/2023	Leslie Palmer	2 email sent/reviewed regarding trial setting	\$400.00	0.1	\$40.00
01/24/2023	Leslie Palmer	4 email sent/reviewed regarding pretrial order	\$400.00	0.1	\$40.00
01/25/2023	Leslie Palmer	drafting witness and exhibit list	\$400.00	3.2	\$1,280.00
01/25/2023	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
01/25/2023	Leslie Palmer	4 email sent/reviewed regarding activity in case	\$400.00	0.1	\$40.00
01/26/2023	Leslie Palmer	Draft, organize, and file pretrial documents including exhibits	\$400.00	5.4	\$2,160.00
01/26/2023	Leslie Palmer	Call with HL RE: pretrial documents	\$400.00	0.2	\$80.00
01/26/2023	Leslie Palmer	11 email sent/reviewed regarding activity in case docket entries	\$400.00	0.2	\$80.00
01/26/2023	Leslie Palmer	2 email sent/reviewed regarding activity in case	\$400.00	0.1	\$40.00
01/26/2023	Leslie Palmer	2 email sent/reviewed regarding Davita Key v Dynamic Security	\$400.00	0.1	\$40.00
01/27/2023	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
01/27/2023	Leslie Palmer	3 email sent/reviewed regarding Amend Exhibit List	\$400.00	0.1	\$40.00

01/29/2023	Leslie Palmer	1 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00
01/30/2023	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
01/30/2023	Leslie Palmer	5 email sent/reviewed regarding case update	\$400.00	0.1	\$40.00
01/31/2023	Leslie Palmer	2 email sent/reviewed regarding update on case	\$400.00	0.1	\$40.00
01/31/2023	Leslie Palmer	1 email sent/reviewed regarding Dynamic leave to file amend exhibit list	\$400.00	0.1	\$40.00
02/01/2023	Leslie Palmer	2 email sent/reviewed regarding Dynamic leave to amend exhibit list	\$400.00	0.1	\$40.00
02/01/2023	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
02/02/2023	Leslie Palmer	5 email sent/reviewed regarding activity in case docket entires	\$400.00	0.1	\$40.00
02/02/2023	Leslie Palmer	5 email sent/reviewed regarding HEA leave to amend exhibit list	\$400.00	0.1	\$40.00
02/03/2023	Leslie Palmer	5 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
02/03/2023	Leslie Palmer	1 email sent/reviewed regarding pretrial order	\$400.00	0.1	\$40.00
02/07/2023	Leslie Palmer	1 email sent/reviewed regarding update	\$400.00	0.1	\$40.00
02/07/2023	Leslie Palmer	3 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
02/07/2023	Leslie Palmer	3 email sent/reviewed regarding pretrial order exhibit list	\$400.00	0.1	\$40.00
02/08/2023	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
02/08/2023	Leslie Palmer	8 email sent/reviewed regarding trial documents	\$400.00	0.1	\$40.00
02/08/2023	Leslie Palmer	Objections to Trial Docs - Depo Designations	\$400.00	3.7	\$1,480.00
02/08/2023	Leslie Palmer	Objection to depo designations Dynamic	\$400.00	1.7	\$680.00
02/08/2023	Leslie Palmer	Call with HL RE Trial Docs/ objecccions	\$400.00	0.2	\$80.00
02/09/2023	Leslie Palmer	3 email sent/reviewed regarding objection to depo designation and exhibit lists	\$400.00	0.1	\$40.00
02/09/2023	Leslie Palmer	16 email sent/reviewed regarding activity in case docket entries	\$400.00	0.3	\$120.00
02/09/2023	Leslie Palmer	File depo designations on CM/ECF	\$400.00	0.5	\$200.00
02/09/2023	Leslie Palmer	Objections to HMMA Designations	\$400.00	3.7	\$1,480.00
02/09/2023	Leslie Palmer	Objections to Dynamic Designations	\$400.00	3.6	\$1,440.00
02/09/2023	Leslie Palmer	Objections to HEA designations	\$400.00	3.1	\$1,240.00
02/10/2023	Leslie Palmer	Review and analyze Court's MSJ opinion	\$400.00	2.1	\$840.00
02/10/2023	Leslie Palmer	8 email sent/reviewed regarding pretrial order	\$400.00	0.1	\$40.00
02/10/2023	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00

02/11/2023	Leslie Palmer	1 email sent/reviewed regarding update	\$400.00	0.1	\$40.00
02/14/2023	Leslie Palmer	Call with Clt today to discuss MSJ opinion	\$400.00	0.3	\$120.00
02/14/2023	Leslie Palmer	1 email sent/reviewed regarding Key v HMMA	\$400.00	0.1	\$40.00
02/16/2023	Leslie Palmer	3 email sent/reviewed regarding resp to depo designations	\$400.00	0.1	\$40.00
02/16/2023	Leslie Palmer	6 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
02/17/2023	Leslie Palmer	1 email sent/reviewed regarding motion to extend pretrial deadlines	\$400.00	0.1	\$40.00
02/20/2023	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
02/21/2023	Leslie Palmer	travel from montgomery pretrial	\$400.00	1.3	\$520.00
02/21/2023	Leslie Palmer	travel to montgomery pretrial	\$400.00	1.3	\$520.00
02/21/2023	Leslie Palmer	Pretrial	\$400.00	1	\$400.00
02/21/2023	Leslie Palmer	1 email sent/reviewed regarding update	\$400.00	0.1	\$40.00
02/21/2023	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
02/22/2023	Leslie Palmer	1 email sent/reviewed regarding pretrial order	\$400.00	0.1	\$40.00
02/22/2023	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
02/23/2023	Leslie Palmer	Pretrial docs, voir dire, jury instructions, motions in limine	\$400.00	4.4	\$1,760.00
02/23/2023	Leslie Palmer	6 email sent/reviewed regarding pretrial order	\$400.00	0.1	\$40.00
02/23/2023	Leslie Palmer	3 email sent/reviewed regarding trial subpoenas	\$400.00	0.1	\$40.00
02/23/2023	Leslie Palmer	4 email sent/reviewed regarding strategy	\$400.00	0.1	\$40.00
02/24/2023	Leslie Palmer	final edits on pretrial documents and file.	\$400.00	2.3	\$920.00
02/24/2023	Leslie Palmer	8 email sent/reviewed regarding trial documents MIL jury charges voir dire	\$400.00	0.1	\$40.00
02/24/2023	Leslie Palmer	6 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
02/28/2023	Leslie Palmer	7 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
02/28/2023	Leslie Palmer	3 email sent/reviewed regarding trial subpoena	\$400.00	0.1	\$40.00
03/01/2023	Leslie Palmer	1 email sent/reviewed regarding activity case docket entry	\$400.00	0.1	\$40.00
03/01/2023	Leslie Palmer	14 email sent/reviewed regarding trial subpoenas 408 communications trial prep	\$400.00	0.2	\$80.00
03/03/2023	Leslie Palmer	1 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
03/06/2023	Leslie Palmer	Email to clt RE: trial prep	\$400.00	0.2	\$80.00
03/06/2023	Leslie Palmer	review and complete tasks on trial prep list	\$400.00	0.4	\$160.00
03/06/2023	Leslie Palmer	Trial prep meetings set	\$400.00	0.4	\$160.00

03/06/2023	Leslie Palmer	Call with Client RE: Trial prep	\$400.00	0.7	\$280.00
03/06/2023	Leslie Palmer	2 email sent/reviewed regarding trial subpoenas and 408 discussions	\$400.00	0.1	\$40.00
03/06/2023	Leslie Palmer	6 email sent/reviewed regarding trial prep meeting	\$400.00	0.2	\$80.00
03/07/2023	Leslie Palmer	File and download court filings RE: MIL objections	\$400.00	0.4	\$160.00
03/07/2023	Leslie Palmer	Draft response to motions in limine 1, 3, 4, 5	\$400.00	3	\$1,200.00
03/07/2023	Leslie Palmer	Call with HL RE: response to motions in limine.	\$400.00	0.3	\$120.00
03/07/2023	Leslie Palmer	10 email sent/reviewed regarding case activity docket entries	\$400.00	0.1	\$40.00
03/07/2023	Leslie Palmer	1 email sent/reviewed regarding Res to MIL	\$400.00	0.1	\$40.00
03/07/2023	Leslie Palmer	1 email sent/reviewed regarding obj to jury instruction	\$400.00	0.1	\$40.00
03/08/2023	Leslie Palmer	Attorney trial prep meeting	\$400.00	1.7	\$680.00
03/08/2023	Leslie Palmer	2 email sent/reviewed regarding trial prep meeting	\$400.00	0.1	\$40.00
03/08/2023	Leslie Palmer	1 email sent/reviewed regarding trial subpoenas	\$400.00	0.1	\$40.00
03/08/2023	Leslie Palmer	6 email sent/reviewed regarding activity in case docket entries	\$400.00	0.1	\$40.00
03/13/2023	Leslie Palmer	Review exhibit list to determine what exhibits may be used and trial prep	\$400.00	4.6	\$1,840.00
03/13/2023	Leslie Palmer	2 email sent/reviewed regarding trial prep meeting	\$400.00	0.1	\$40.00
03/13/2023	Leslie Palmer	1 email sent/reviewed regarding trial deposition	\$400.00	0.1	\$40.00
03/14/2023	Leslie Palmer	11 email sent/reviewed regarding trial prep subpoenas and trial depositions and other trial matters	\$400.00	0.2	\$80.00
03/15/2023	Leslie Palmer	Meeting with client for trial prep	\$400.00	1.9	\$760.00
03/15/2023	Leslie Palmer	Call with HL re: settlement	\$400.00	0.4	\$160.00
03/15/2023	Leslie Palmer	Call with HL post client meeting to discuss next steps	\$400.00	0.2	\$80.00
03/15/2023	Leslie Palmer	2 email sent/reviewed regarding hotel reservations for trial	\$400.00	0.1	\$40.00
03/16/2023	Leslie Palmer	Trial prep with HL - worked on PI outline, exhibits, themes assignments	\$400.00	4.2	\$1,680.00
03/16/2023	Leslie Palmer	3 email sent/reviewed regarding trial documents	\$400.00	0.1	\$40.00
03/16/2023	Leslie Palmer	2 email sent/reviewed regarding case activity docket entry	\$400.00	0.1	\$40.00
03/17/2023	Leslie Palmer	Trial Prep PI testimony	\$400.00	3.7	\$1,480.00
03/17/2023	Leslie Palmer	2 email sent/reviewed regarding activity in case docket entry	\$400.00	0.1	\$40.00
03/17/2023	Leslie Palmer	1 email sent/reviewed regarding trial documents	\$400.00	0.1	\$40.00
03/18/2023	Leslie Palmer	PI Testimony prep	\$400.00	3.9	\$1,560.00
03/19/2023	Leslie Palmer	1 email sent/reviewed regarding	\$400.00	0.1	\$40.00

		transcript pad report			
03/19/2023	Leslie Palmer	4 email sent/reviewed regarding meeting with client for prep	\$400.00	0.1	\$40.00
03/20/2023	Leslie Palmer	Call with HL - planning and discussion of trial	\$400.00	1.7	\$680.00
03/20/2023	Leslie Palmer	Call with client post deposition	\$400.00	0.3	\$120.00
03/20/2023	Leslie Palmer	Witness prep - Cureton - outline depo review	\$400.00	4.7	\$1,880.00
03/20/2023	Leslie Palmer	Deposition - Gloria Robinson	\$400.00	1.2	\$480.00
03/20/2023	Leslie Palmer	6 email sent/reviewed regarding trial depositions	\$400.00	0.1	\$40.00
03/20/2023	Leslie Palmer	7 email sent/reviewed regarding meeting with client for prep	\$400.00	0.1	\$40.00
03/21/2023	Leslie Palmer	12 email sent/reviewed regarding trial documents and witnesses	\$400.00	0.2	\$80.00
03/22/2023	Leslie Palmer	4 email sent/reviewed regarding trial documents	\$400.00	0.1	\$40.00
03/23/2023	Leslie Palmer	22 email sent/reviewed regarding trial documents	\$400.00	0.4	\$160.00
03/23/2023	Leslie Palmer	Travel to Montgomery for jury quest and tech testing	\$400.00	1.7	\$680.00
03/23/2023	Leslie Palmer	Travel from Montgomery after jury quest and tech testing	\$400.00	1.7	\$680.00
03/23/2023	Leslie Palmer	Trial Prep - Plaintiff	\$400.00	1.2	\$480.00
03/23/2023	Leslie Palmer	Pickup jury quest and trial tech testing	\$400.00	1.3	\$520.00
03/24/2023	Leslie Palmer	Trial notebook prep	\$400.00	4.3	\$1,720.00
03/24/2023	Leslie Palmer	Trial prep - Plaintiff	\$400.00	3.2	\$1,280.00
03/24/2023	Leslie Palmer	9 email sent/reviewed regarding trial documents scheduling and activity	\$400.00	0.2	\$80.00
03/25/2023	Leslie Palmer	Trial prep - Plaintiff	\$400.00	3.1	\$1,240.00
03/25/2023	Leslie Palmer	trial prep - meeting with plaintiff	\$400.00	1.3	\$520.00
03/25/2023	Leslie Palmer	3 emails sent regarding trail activity and documents	\$400.00	0.1	\$40.00
03/26/2023	Leslie Palmer	travel to Montgomery for trial	\$400.00	1.5	\$600.00
03/26/2023	Leslie Palmer	8 email sent/reviewed regarding trial activity and documents	\$400.00	0.2	\$80.00
03/27/2023	Leslie Palmer	Jury Trial	\$400.00	9	\$3,600.00
03/27/2023	Leslie Palmer	trial prep review for witnesses	\$400.00	3	\$1,200.00
03/27/2023	Leslie Palmer	12 email sent/reviewed regarding trial witnesses and trial activity	\$400.00	0.3	\$120.00
03/28/2023	Leslie Palmer	Trial Prep - Closing	\$400.00	3.8	\$1,520.00
03/28/2023	Leslie Palmer	Jury Trial	\$400.00	9	\$3,600.00
03/28/2023	Leslie Palmer	13 email sent/reviewed regarding Activity in Case - docket entries	\$400.00	0.3	\$120.00
03/28/2023	Leslie Palmer	2 email sent/reviewed regarding trial deposition video clips	\$400.00	0.1	\$40.00
03/29/2023	Leslie Palmer	Trial Prep - Closing and Evidence review	\$400.00	1.6	\$640.00
03/29/2023	Leslie Palmer	Travel from Montgomery from jury trial	\$400.00	1.5	\$600.00
03/29/2023	Leslie Palmer	Jury Trial	\$400.00	9	\$3,600.00

03/29/2023	Leslie Palmer	7 email sent/reviewed regarding activity in case - court docket entries	\$400.00	0.2	\$80.00
03/29/2023	Leslie Palmer	2 email sent/reviewed regarding sharefile from Dynamic of deposition clips	\$400.00	0.1	\$40.00
03/30/2023	Leslie Palmer	Trial Prep - voir dire review, review jury questionnaire	\$400.00	3.4	\$1,360.00
03/30/2023	Leslie Palmer	Download and file trial/case related e-mails.	\$400.00	2.1	\$840.00
03/30/2023	Leslie Palmer	1 email sent/reviewed regarding projected appeal issues	\$400.00	0.1	\$40.00
03/30/2023	Leslie Palmer	Six email sent/reviewed regarding Activity in case docket entries	\$400.00	0.2	\$80.00
03/30/2023	Leslie Palmer	1 email sent/reviewed regarding verdict	\$400.00	0.1	\$40.00
03/31/2023	Leslie Palmer	1 email sent/reviewed regarding activity in case - court docket	\$400.00	0.1	\$40.00
04/12/2023	Leslie Palmer	6 email sent/reviewed regarding interview	\$400.00	0.1	\$40.00
04/13/2023	Leslie Palmer	2 email sent/reviewed regarding case activity - docket entries	\$400.00	0.1	\$40.00
04/14/2023	Leslie Palmer	2 email sent/reviewed regarding questions	\$400.00	0.1	\$40.00
04/17/2023	Leslie Palmer	3 email sent/reviewed regarding cost bill	\$400.00	0.1	\$40.00
04/17/2023	Leslie Palmer	1 email sent/reviewed regarding update	\$400.00	0.1	\$40.00
04/18/2023	Leslie Palmer	1 email sent/reviewed regarding article	\$400.00	0.1	\$40.00
04/19/2023	Leslie Palmer	4 email sent/reviewed regarding update	\$400.00	0.1	\$40.00
04/20/2023	Leslie Palmer	Teams meeting with Clt RE: status/ next steps	\$400.00	0.1	\$40.00
04/21/2023	Leslie Palmer	2 email sent/reviewed regarding Fee Petition Affidavit from Sonya Edwards	\$400.00	0.1	\$40.00
04/21/2023	Leslie Palmer	Call with Jim Roberts Re: Fee Petition Affidavit	\$400.00	0.1	\$40.00
04/24/2023	Leslie Palmer	Conference with HL RE: fee petition	\$400.00	0.3	\$120.00
04/24/2023	Leslie Palmer	Review and Edit Motion for Injunctive Relief. Originally drafted by HL. Updated damages chart to reflect no benefits for prejudgment interest calculation	\$400.00	0.9	\$360.00
04/24/2023	Leslie Palmer	2 email sent/reviewed regarding Motion for Inj Relief	\$400.00	0.1	\$40.00
04/25/2023	Leslie Palmer	File Motion for EQUITABLE RELIEF OF REINSTATEMENT AND INTEREST	\$400.00	0.2	\$80.00
04/25/2023	Leslie Palmer	Drafting Fee Petition Affidavit	\$400.00	2.5	\$1,000.00
04/26/2023	Leslie Palmer	Continue work on Fee Petition Affidavit and Bill of Cost	\$400.00	2.1	\$840.00
05/02/2023	Leslie Palmer	Draft Motion for Ext on Fee Petition and Bill of Cost	\$400.00	0.2	\$80.00
05/03/2023	Leslie Palmer	Verify with Def. that no opposition	\$400.00	0.2	\$80.00

		to Motion to ext Fee petition and bill of cost, edit document to add no opposition and change service date. File.			
05/03/2023	Leslie Palmer	Call with HL RE: Motion to ext Fee petition	\$400.00	0.1	\$40.00
05/09/2023	Leslie Palmer	Call with counsel RE: mediation and scheduling of briefing.	\$400.00	0.3	\$120.00
05/09/2023	Leslie Palmer	Conference with HL RE: mediation and appeal.	\$400.00	0.4	\$160.00
05/09/2023	Leslie Palmer	Draft Motion to Continue Post Judgment Briefing Pending Mediation	\$400.00	0.5	\$200.00
05/10/2023	Leslie Palmer	Edits to Joint Motion after review of Dynamic Edits	\$400.00	0.4	\$160.00
05/10/2023	Leslie Palmer	File Joint Motion for Post Trial Response Extension. E-mail Chambers	\$400.00	0.2	\$80.00
06/02/2023	Leslie Palmer	Conference with Heather Leonard RE: mediation	\$400.00	0.2	\$80.00
06/05/2023	Leslie Palmer	Call with Heather Leonard RE: mediation statement	\$400.00	0.4	\$160.00
06/05/2023	Leslie Palmer	Call with client RE: mediation	\$400.00	0.4	\$160.00
06/06/2023	Leslie Palmer	Review mediation statement drafted by Heather Leonard in advance of mediation.	\$400.00	0.3	\$120.00
06/06/2023	Leslie Palmer	Review and analyze Dynamic post trial motion in advance of mediation	\$400.00	1.7	\$680.00
06/08/2023	Leslie Palmer	Travel with client from Mediation	\$400.00	2.4	\$960.00
06/08/2023	Leslie Palmer	Mediation	\$400.00	7	\$2,800.00
06/24/2023	Leslie Palmer	Call with Heather Leonard regarding Rule 59 response	\$400.00	0.3	\$120.00
06/24/2023	Leslie Palmer	Research post judgment issues	\$400.00	1.7	\$680.00
06/25/2023	Leslie Palmer	Review and Rule 59 Response - originally drafted by Heather Leonard. Research additional issues	\$400.00	2.4	\$960.00
06/26/2023	Leslie Palmer	Make Edits to Rule 59 Response drafted by Heather Leonard	\$400.00	5.1	\$2,040.00
06/27/2023	Leslie Palmer	Final edits to Rule 59 Response and File.	\$400.00	1.8	\$720.00
06/28/2023	Leslie Palmer	Review and discuss Dynamic Response to Motion for Equitable relief.	\$400.00	0.3	\$120.00
07/07/2023	Leslie Palmer	Draft Reply Brief for Motion for Equitable Relief for Heather Leonard to review.	\$400.00	2.1	\$840.00
07/10/2023	Leslie Palmer	Review and consider edits to Reply Brief made by Heather Leonard. Final Proof Read. File.	\$400.00	1.4	\$560.00
03/28/2024	Leslie Palmer	4 emails sent and reviewed RE: plaintiff moving.	\$400.00	0.2	\$80.00
03/28/2024	Leslie Palmer	2 emails sent and reviewed RE: case status.	\$400.00	0.1	\$40.00
03/28/2024	Leslie Palmer	Review and analyze Post trial order RE: Equitable Relief	\$400.00	0.2	\$80.00

03/28/2024	Leslie Palmer	Call with HL RE: post trial order.	\$400.00	0.1	\$40.00
03/28/2024	Leslie Palmer	2 emails sent and reviewed RE: case status.	\$400.00	0.1	\$40.00
03/28/2024	Leslie Palmer	Review and analyze Post trial order RE: JML	\$400.00	0.2	\$80.00
03/28/2024	Leslie Palmer	2 emails sent and reviewed RE: case status.	\$400.00	0.1	\$40.00
03/28/2024	Leslie Palmer	2 emails sent and reviewed RE: case status.	\$400.00	0.1	\$40.00
03/28/2024	Leslie Palmer	Call with HL RE: post trial order.	\$400.00	0.1	\$40.00
03/28/2024	Leslie Palmer	Call with client RE: fee declaration	\$400.00	0.2	\$80.00
03/28/2024	Leslie Palmer	E-mail to CLT RE: declaration	\$400.00	0.1	\$40.00
03/28/2024	Leslie Palmer	Draft Declaration for PL to sign RE: finding counsel	\$400.00	0.2	\$80.00
Time Entries Total:				425.1	\$170,040.00
				Total	\$170,040.00
				Amount Due	\$170,040.00

Date	Subject	From:
4/19/23 16:36	Accepted: Re: Davita Key	Heather@HeatherLeonardPC.com
4/19/23 15:57	Accepted: Davita Key	AYurkanin@al.com
4/19/23 15:56	Re: Update	dmkey825@gmail.com
4/19/23 15:52	Re: Davita Key	AYurkanin@al.com
4/19/23 15:51	Re: Update	dmkey825@gmail.com
4/19/23 15:50	Re: Update	dmkey825@gmail.com
4/19/23 15:47	Re: Update	dmkey825@gmail.com
4/19/23 15:31	RE: Davita Key	Heather@HeatherLeonardPC.com
4/19/23 15:30	Automatic reply: Davita Key	Heather@HeatherLeonardPC.com
4/19/23 15:26	FW: Davita Key	Heather@HeatherLeonardPC.com
4/18/23 17:05	Re: Davita Key	AYurkanin@al.com
4/18/23 16:28	RE: Davita Key	Heather@HeatherLeonardPC.com
4/18/23 9:31	RE: Key - Bill of Costs - transcripts	Heather@HeatherLeonardPC.com
4/17/23 17:10	Update	dmkey825@gmail.com
4/17/23 16:51	Key - Bill of costs (draft	Heather@HeatherLeonardPC.com
4/17/23 15:58	Key- Bill of Costs - corrected chart tocomplete for depo invoices	Heather@HeatherLeonardPC.com
4/17/23 15:57	Key - Bill of Costs - transcripts	Heather@HeatherLeonardPC.com
4/14/23 12:43	Re: Question	dmkey825@gmail.com
4/14/23 12:10	Question	dmkey825@gmail.com
4/13/23 15:27	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Cos efile_notice@almd.uscourts.gov	
4/13/23 15:26	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Cos efile_notice@almd.uscourts.gov	
4/12/23 16:08	Re: Al.com Interview	dmkey825@gmail.com
4/12/23 14:30	RE: Al.com Interview	Heather@HeatherLeonardPC.com
4/12/23 14:28	Re: Al.com Interview	dmkey825@gmail.com
4/12/23 13:41	Re: Al.com Interview	dmkey825@gmail.com
4/12/23 12:49	RE: Call from al.com to interview Davita Key	Heather@HeatherLeonardPC.com
4/12/23 10:29	Call from al.com to interview Davita Key	Heather@HeatherLeonardPC.com
4/5/23 23:10	RE: Laptop stand	sbullock@fordharrison.com
4/5/23 18:47	RE: Laptop stand	sbullock@fordharrison.com
3/31/23 9:09	Activity in Case 2:22-cv-00505-MHH Key v. Hyundai Motor Manufacturing	cmecf_ALND@alnd.uscourts.gov
3/30/23 17:08	Re: Law360 request for comment	grace.elletson@law360.com
3/30/23 17:04	Re: Law360 request for comment	Heather@HeatherLeonardPC.com

3/30/23 14:11	RE: [NELA-AL] : Retaliation Appellate Issues - knowledge of complaint as Mail@ConnectedCommunity.org
3/30/23 11:28	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Jur efile_notice@almd.uscourts.gov
3/30/23 11:28	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Jur efile_notice@almd.uscourts.gov
3/30/23 11:26	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Jur efile_notice@almd.uscourts.gov
3/30/23 10:55	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Jur efile_notice@almd.uscourts.gov
3/30/23 10:44	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Jud efile_notice@almd.uscourts.gov
3/30/23 10:10	RE: Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Heather@HeatherLeonardPC.com
3/30/23 10:09	RE: Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. GERALD.MILLER@EEOC.GOV
3/30/23 9:52	RE: Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Heather@HeatherLeonardPC.com
3/30/23 9:49	FW: Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc GERALD.MILLER@EEOC.GOV
3/30/23 9:44	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Jur efile_notice@almd.uscourts.gov
3/30/23 9:41	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Jur efile_notice@almd.uscourts.gov
3/29/23 12:43	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Orc efile_notice@almd.uscourts.gov
3/29/23 12:41	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Mo efile_notice@almd.uscourts.gov
3/29/23 10:27	Sharefile - Dynamic / Key CMcCloyne@fordharrison.com
3/29/23 10:22	Michael Mazzella has shared the folder 'Dynamic-Key Deposition Clips 03 mail@sf-notifications.com
3/29/23 10:18	Michael Mazzella has shared the folder 'Dynamic-Key Deposition Clips 03 mail@sf-notifications.com
3/29/23 10:12	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Orc efile_notice@almd.uscourts.gov
3/29/23 9:47	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Mo efile_notice@almd.uscourts.gov
3/28/23 17:59	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Jur efile_notice@almd.uscourts.gov
3/28/23 17:03	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Orc efile_notice@almd.uscourts.gov
3/28/23 16:46	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Mo efile_notice@almd.uscourts.gov
3/28/23 12:04	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Voi efile_notice@almd.uscourts.gov
3/28/23 11:22	RE: Robinson video clips Heather@HeatherLeonardPC.com
3/28/23 11:20	Robinson video clips sbullock@fordharrison.com
3/28/23 9:07	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Orc efile_notice@almd.uscourts.gov
3/28/23 9:04	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Orc efile_notice@almd.uscourts.gov
3/28/23 9:01	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Orc efile_notice@almd.uscourts.gov
3/28/23 8:59	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Orc efile_notice@almd.uscourts.gov
3/28/23 8:57	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Orc efile_notice@almd.uscourts.gov
3/28/23 8:54	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Orc efile_notice@almd.uscourts.gov
3/28/23 8:50	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Orc efile_notice@almd.uscourts.gov
3/28/23 8:48	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Orc efile_notice@almd.uscourts.gov

3/28/23 8:43	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Or	efile_notice@almd.uscourts.gov
3/27/23 21:00	Re: Automatic reply: Sherry Spires	WRedmond@fordharrison.com
3/27/23 20:24	Re: Automatic reply: Sherry Spires	WRedmond@fordharrison.com
3/27/23 17:28	RE: Cureton Witness Information	Heather@HeatherLeonardPC.com
3/27/23 14:17	Key v Dynamic Security - final version of Robinson Depo	Heather@HeatherLeonardPC.com
3/27/23 12:49	2:91-cv-767-ECM-SMD - Key v Dynamic Robinson Deposition Designations	Heather@HeatherLeonardPC.com
3/27/23 12:26	Re: 2022-08-30 Ray Cureton Synched Video Deposition	taylor@citedepos.com
3/27/23 12:01	RE: 2022-08-30 Ray Cureton Synched Video Deposition	Heather@HeatherLeonardPC.com
3/27/23 11:56	Final Jury	Heather@HeatherLeonardPC.com
3/27/23 11:54	2:19-cv-767 - Key v Dynamic - Robinson Deposition Designation	Heather@HeatherLeonardPC.com
3/27/23 10:48	2022-08-30 Ray Cureton Synched Video Deposition	info@citedepos.com
3/27/23 10:08	Notes on potential jurors	Heather@HeatherLeonardPC.com
3/27/23 6:36	Sherry Spires	WRedmond@fordharrison.com
3/26/23 23:23	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Pro	efile_notice@almd.uscourts.gov
3/26/23 22:06	Corrected DX 18 [IWOV-WSACTIVELLP.FID1997338]	sbullock@fordharrison.com
3/26/23 20:26	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. De	efile_notice@almd.uscourts.gov
3/26/23 20:07	RE: Key print	Heather@HeatherLeonardPC.com
3/26/23 20:05	Automatic reply: Key print	Heather@HeatherLeonardPC.com
3/26/23 10:28	Key v Dynamic - Heather's notes on juror questionnaires	Heather@HeatherLeonardPC.com
3/26/23 10:10	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Pro	efile_notice@almd.uscourts.gov
3/26/23 8:43	Key v Dynamic - jury verdict form I prepared for your review	Heather@HeatherLeonardPC.com
3/25/23 21:07	Case	dmkey825@gmail.com
3/25/23 14:56	Gloria Robinson transcript [IWOV-WSACTIVELLP.FID1997338]	WRedmond@fordharrison.com
3/25/23 13:16	Re: Key - Backpay Demonstrative	Heather@HeatherLeonardPC.com
3/24/23 17:57	Fwd: Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC, et al.,	Heather@HeatherLeonardPC.com
3/24/23 17:09	Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC, et al., - Tra	tptr.prod@tp.one
3/24/23 16:16	Accepted: Meeting	Heather@HeatherLeonardPC.com
3/24/23 13:09	RE: Key v Dynamic Security - opening [IWOV-WSACTIVELLP.FID1997338]	WRedmond@fordharrison.com
3/24/23 13:08	RE: Key v Dynamic Security - opening [IWOV-WSACTIVELLP.FID1997338]	Heather@HeatherLeonardPC.com
3/24/23 13:07	RE: Key v Dynamic Security - opening [IWOV-WSACTIVELLP.FID1997338]	WRedmond@fordharrison.com
3/24/23 13:02	RE: Key v Dynamic Security - opening [IWOV-WSACTIVELLP.FID1997338]	Heather@HeatherLeonardPC.com
3/24/23 11:12	RE: Key v Dynamic Security - opening [IWOV-WSACTIVELLP.FID1997338]	WRedmond@fordharrison.com
3/24/23 10:02	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Pre	efile_notice@almd.uscourts.gov

3/23/23 18:23 Meeting	dmkey825@gmail.com
3/23/23 14:42 Your Parking Receipt	info@alerts.parkmobile.io
3/23/23 13:04 Key v Dynamic Security - opening	Heather@HeatherLeonardPC.com
3/23/23 11:12 Re: Meeting	dmkey825@gmail.com
3/23/23 10:41 Re: Meeting	dmkey825@gmail.com
3/23/23 10:26 RE: Dynamic/Key: Defendant's exhibit list and exhibits.	Heather@HeatherLeonardPC.com
3/23/23 10:25 Re: Dynamic/Key: Defendant's exhibit list and exhibits.	sbullock@fordharrison.com
3/23/23 10:23 RE: Dynamic/Key: Defendant's exhibit list and exhibits.	Heather@HeatherLeonardPC.com
3/23/23 10:13 RE: Dynamic/Key: Defendant's exhibit list and exhibits.	CMcCloyn@fordharrison.com
3/23/23 10:13 RE: Key v Dynamic Security - Plaintiff's Trial Exhibits [IWOV-WSACTIVELLI WRedmond@fordharrison.com	
3/23/23 10:05 Andrew Robinson has shared the folder 'Dynamic Key - Defendant's Trial mail@sf-notifications.com	
3/23/23 10:02 RE: Dynamic/Key: Defendant's exhibit list and exhibits.	Heather@HeatherLeonardPC.com
3/23/23 10:01 [NELA-AL] : Order for trial witness - if defendant is calling in their case, h Mail@ConnectedCommunity.org	
3/23/23 9:59 RE: Dynamic/Key: Defendant's exhibit list and exhibits.	CMcCloyn@fordharrison.com
3/23/23 9:55 RE: Key v Dynamic Security - Plaintiff's Trial Exhibits [IWOV-WSACTIVELLI Heather@HeatherLeonardPC.com	
3/23/23 9:52 RE: Dynamic/Key: Defendant's exhibit list and exhibits.	Heather@HeatherLeonardPC.com
3/23/23 9:50 RE: Key v Dynamic Security - Plaintiff's Trial Exhibits [IWOV-WSACTIVELLI Heather@HeatherLeonardPC.com	
3/23/23 9:50 RE: Key v Dynamic Security - Plaintiff's Trial Exhibits [IWOV-WSACTIVELLI WRedmond@fordharrison.com	
3/23/23 9:43 RE: Dynamic/Key: Defendant's exhibit list and exhibits.	Heather@HeatherLeonardPC.com
3/23/23 9:41 RE: Key v Dynamic Security - Plaintiff's Trial Exhibits [IWOV-WSACTIVELLI Heather@HeatherLeonardPC.com	
3/23/23 9:39 RE: Key v Dynamic Security - Plaintiff's Trial Exhibits [IWOV-WSACTIVELLI Heather@HeatherLeonardPC.com	
3/23/23 9:28 Re: Dynamic/Key: Defendant's exhibit list and exhibits.	sbullock@fordharrison.com
3/22/23 22:46 Dynamic/Key: Defendant's exhibit list and exhibits.	sbullock@fordharrison.com
3/22/23 18:25 RE: Key v Dynamic Security - Plaintiff's Trial Exhibits [IWOV-WSACTIVELLI WRedmond@fordharrison.com	
3/22/23 17:17 RE: Key v Dynamic Security - Plaintiff's Trial Exhibits [IWOV-WSACTIVELLI WRedmond@fordharrison.com	
3/22/23 15:52 Emailing: px 25 - mailroom site map	Heather@HeatherLeonardPC.com
3/21/23 13:06 RE: Key v Dynamic Security - px 17- dynamic security officer's handbook.p WRedmond@fordharrison.com	
3/21/23 13:05 RE: Key v Dynamic Security - px 17- dynamic security officer's handbook.p Heather@HeatherLeonardPC.com	
3/21/23 12:55 RE: Key v Dynamic Security - px 17- dynamic security officer's handbook.p WRedmond@fordharrison.com	
3/21/23 12:43 Key v Dynamic Security - px 17- dynamic security officer's handbook.pdf Heather@HeatherLeonardPC.com	
3/21/23 12:13 RE: Cureton Witness Information	Heather@HeatherLeonardPC.com
3/21/23 12:05 FW: Subpoena to Serve in Montgomery	Heather@HeatherLeonardPC.com
3/21/23 10:29 For review: new secure message	communicate@smokeball.com

3/21/23 10:14	Key v Dynamic Security - Plaintiff's Trial Exhibits	Heather@HeatherLeonardPC.com
3/21/23 10:06	Key v Dynamic - updated exhibit list comparison	Heather@HeatherLeonardPC.com
3/21/23 9:58	Automatic reply: Subpoena to Serve in Montgomery	Heather@HeatherLeonardPC.com
3/21/23 9:54	FW: Subpoena to Serve in Montgomery	Heather@HeatherLeonardPC.com
3/21/23 9:51	For review: new secure message	communicate@smokeball.com
3/20/23 19:32	For review: new secure message	communicate@smokeball.com
3/20/23 19:16	Key v Dynamice - updated/corrected exhibit list	Heather@HeatherLeonardPC.com
3/20/23 18:03	Key v Dynamic - Exhibit List Chart for the Court for trial	Heather@HeatherLeonardPC.com
3/20/23 14:56	RE: Nicolle Scavella and Rule 408 Discussion	Heather@HeatherLeonardPC.com
3/20/23 13:23	Re: Meeting	Leslie@palmerlegalservices.com
3/20/23 12:34	Re: Meeting	dmkey825@gmail.com
3/20/23 11:57	RE: Nicolle Scavella and Rule 408 Discussion	WRedmond@fordharrison.com
3/20/23 11:07	Re: Meeting	dmkey825@gmail.com
3/20/23 9:34	Nicolle Scavella	WRedmond@fordharrison.com
3/20/23 9:26	Re: Meeting	dmkey825@gmail.com
3/20/23 9:19	Re: Meeting	dmkey825@gmail.com
3/20/23 8:33	Re: Meeting	dmkey825@gmail.com
3/20/23 8:11	Re: Meeting	dmkey825@gmail.com
3/19/23 21:45	Re: Meeting	dmkey825@gmail.com
3/19/23 17:50	Re: Meeting	dmkey825@gmail.com
3/19/23 17:45	Re: Meeting	dmkey825@gmail.com
3/19/23 16:54	Meeting	dmkey825@gmail.com
3/19/23 10:52	Report	Leslie@palmerlegalservices.com
3/17/23 14:40	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Bill efile_notice@almd.uscourts.gov	
3/17/23 9:57	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Bill efile_notice@almd.uscourts.gov	
3/17/23 9:40	RE: Dynamic - Key [IWOV-WSACTIVELLP.FID1997338]	SHolland@fordharrison.com
3/16/23 18:01	RE: Dynamic - Key	CMcCloy@fordharrison.com
3/16/23 16:26	RE: Dynamic - Key	Heather@HeatherLeonardPC.com
3/16/23 16:26	2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc.	Cindy_Sanders@almd.uscourts.gov
3/16/23 10:59	Key v Dynamic Security - Trial Subpoens	Heather@HeatherLeonardPC.com
3/16/23 10:53	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. No efile_notice@almd.uscourts.gov	
3/15/23 16:44	RE: Hotel Room for Key	Heather@HeatherLeonardPC.com
3/15/23 11:51	Hotel Room for Key	Heather@HeatherLeonardPC.com

3/14/23 17:52	RE: Dynamic - Key - Letter to Palmer Leonard re Trial Subp. EM 03-14-20	Heather@HeatherLeonardPC.com
3/14/23 17:51	RE: Dynamic - Key	Heather@HeatherLeonardPC.com
3/14/23 17:38	RE: Dynamic - Key - Letter to Palmer Leonard re Trial Subp. EM 03-14-20	WRedmond@fordharrison.com
3/14/23 17:09	RE: Dynamic - Key	WRedmond@fordharrison.com
3/14/23 16:47	RE: Dynamic - Key	Heather@HeatherLeonardPC.com
3/14/23 16:18	RE: Dynamic - Key - Letter to Palmer Leonard re Trial Subp. EM 03-14-20	Heather@HeatherLeonardPC.com
3/14/23 16:14	RE: Dynamic - Key - Letter to Palmer Leonard re Trial Subp. EM 03-14-20	Heather@HeatherLeonardPC.com
3/14/23 15:41	Dynamic - Key - Letter to Palmer Leonard re Trial Subp. EM 03-14-2023 [WRedmond@fordharrison.com
3/14/23 15:17	RE: Notices of Trial Deposition [IWOV-WSACTIVE LLP.FID1997338]	WRedmond@fordharrison.com
3/14/23 14:10	Re: Key Plaintiff Prep Meeting One	dmkey825@gmail.com
3/14/23 9:54	Dynamic - Key	CMcCloyne@fordharrison.com
3/13/23 15:41	Notices of Trial Deposition [IWOV-WSACTIVE LLP.FID1997338]	WRedmond@fordharrison.com
3/13/23 12:53	Re: Key Plaintiff Prep Meeting One	dmkey825@gmail.com
3/13/23 12:52	Accepted: Key Plaintiff Prep Meeting One @ Wed Mar 15, 2023 11:15am	dmkey825@gmail.com
3/8/23 16:32	RE: Key v Dynamic - trial subpoenas [IWOV-WSACTIVE LLP.FID1997338]	WRedmond@fordharrison.com
3/8/23 16:18	Accepted: Key v. Dynamic - Attorney Trial Prep Meeting 2	Heather@HeatherLeonardPC.com
3/8/23 16:13	Automatic reply: Key v. Dynamic - Attorney Trial Prep Meeting 2	Heather@HeatherLeonardPC.com
3/8/23 14:16	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Me	efile_notice@almd.uscourts.gov
3/8/23 12:11	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Obj	efile_notice@almd.uscourts.gov
3/8/23 11:44	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Obj	efile_notice@almd.uscourts.gov
3/8/23 11:42	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Obj	efile_notice@almd.uscourts.gov
3/8/23 11:39	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Obj	efile_notice@almd.uscourts.gov
3/8/23 11:35	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Obj	efile_notice@almd.uscourts.gov
3/7/23 20:34	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. BR	efile_notice@almd.uscourts.gov
3/7/23 20:25	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Re	efile_notice@almd.uscourts.gov
3/7/23 20:24	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Re	efile_notice@almd.uscourts.gov
3/7/23 20:23	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Re	efile_notice@almd.uscourts.gov
3/7/23 20:22	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Re	efile_notice@almd.uscourts.gov
3/7/23 20:02	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Re	efile_notice@almd.uscourts.gov
3/7/23 20:01	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Re	efile_notice@almd.uscourts.gov
3/7/23 19:59	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Re	efile_notice@almd.uscourts.gov
3/7/23 19:56	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Re	efile_notice@almd.uscourts.gov
3/7/23 17:51	RE: Key - Obj to Jury Instruction	Heather@HeatherLeonardPC.com

3/7/23 17:29	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Re: efile_notice@almd.uscourts.gov	
3/7/23 14:35	RE: KEY - Draft resp to 1st mil	Heather@HeatherLeonardPC.com
3/6/23 17:20	Accepted: Key Attorney Trial Prep Meeting #1	Heather@HeatherLeonardPC.com
3/6/23 14:16	Re: Key v. Dynamic Security - Your Deposition and Trial Prep	dmkey825@gmail.com
3/6/23 13:02	Accepted: Key PI Prep Meeting #2	Heather@HeatherLeonardPC.com
3/6/23 13:02	Accepted: Key Plaintiff Prep Meeting One	Heather@HeatherLeonardPC.com
3/6/23 12:37	Automatic reply: Key Plaintiff Prep Meeting One	Heather@HeatherLeonardPC.com
3/6/23 10:45	Open Days for Davita PRep	Heather@HeatherLeonardPC.com
3/6/23 9:13	RE: Key v Dynamic - trial subpoenas and Rule 408 settlement discussions	Heather@HeatherLeonardPC.com
3/6/23 8:38	FW: Key v Dynamic - trial subpoenas and Rule 408 settlement discussions	WRedmond@fordharrison.com
3/3/23 20:02	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Mo efile_notice@almd.uscourts.gov	
3/1/23 14:06	RE: Key v Dynamic - trial subpoenas [IWOV-WSACTIVELLP.FID1997338]	Heather@HeatherLeonardPC.com
3/1/23 14:02	RE: Key v Dynamic - trial subpoenas [IWOV-WSACTIVELLP.FID1997338]	WRedmond@fordharrison.com
3/1/23 13:53	RE: Key v Dynamic - trial subpoenas [IWOV-WSACTIVELLP.FID1997338]	Heather@HeatherLeonardPC.com
3/1/23 13:51	RE: Key v Dynamic - trial subpoenas [IWOV-WSACTIVELLP.FID1997338]	WRedmond@fordharrison.com
3/1/23 13:17	FW: Signed Copy	Heather@HeatherLeonardPC.com
3/1/23 13:15	RE: Signed Copy	Heather@HeatherLeonardPC.com
3/1/23 13:15	Signed Copy	dmkey825@gmail.com
3/1/23 13:11	Case Information	dmkey825@gmail.com
3/1/23 12:49	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Obj efile_notice@almd.uscourts.gov	
3/1/23 11:39	Key v Dynamic - trial subpoenas	Heather@HeatherLeonardPC.com
3/1/23 11:28	RE: Key v Dynamic Security - settlement communicaiton [IWOV-WSACTIV	Heather@HeatherLeonardPC.com
3/1/23 11:24	RE: Key v Dynamic Security - settlement communicaiton [IWOV-WSACTIV	WRedmond@fordharrison.com
3/1/23 11:22	RE: Key v Dynamic Security - settlement communicaiton	Heather@HeatherLeonardPC.com
3/1/23 11:16	Key v Dynamic - trial preparation on injuries (please return worksheets by	Heather@HeatherLeonardPC.com
3/1/23 11:05	Key v Dynamic - trial prep checklist	Heather@HeatherLeonardPC.com
2/28/23 22:58	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Pro efile_notice@almd.uscourts.gov	
2/28/23 21:10	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Mo efile_notice@almd.uscourts.gov	
2/28/23 20:45	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Mo efile_notice@almd.uscourts.gov	
2/28/23 20:43	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Mo efile_notice@almd.uscourts.gov	
2/28/23 19:55	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Mo efile_notice@almd.uscourts.gov	
2/28/23 19:53	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Mo efile_notice@almd.uscourts.gov	
2/28/23 16:31	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Pro efile_notice@almd.uscourts.gov	

2/28/23 11:05	Re: Key v Dynamic - trial subpoena for Carolyn Williams	mmiller@bradley.com
2/28/23 10:06	RE: Key v Dynamic - trial subpoena for Carolyn Williams	Heather@HeatherLeonardPC.com
2/28/23 5:32	Re: Key v Dynamic - trial subpoena for Carolyn Williams	mmiller@bradley.com
2/24/23 12:08	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Pro efile_notice@almd.uscourts.gov	
2/24/23 11:55	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Mo efile_notice@almd.uscourts.gov	
2/24/23 11:46	Proposed voir dire	Heather@HeatherLeonardPC.com
2/24/23 10:57	Key v Dynamic - 4th MIL on Unemployment Finding	Heather@HeatherLeonardPC.com
2/24/23 10:40	2:19-cv-767-ECM-SMD; Key v Dynamic Security - Plaintiff's Proposed Jury	Heather@HeatherLeonardPC.com
2/24/23 10:40	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Mo efile_notice@almd.uscourts.gov	
2/24/23 10:39	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Mo efile_notice@almd.uscourts.gov	
2/24/23 10:39	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Mo efile_notice@almd.uscourts.gov	
2/24/23 10:35	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Pro efile_notice@almd.uscourts.gov	
2/24/23 10:25	RE: Key v Dynamic - draft jury charges for your review	Heather@HeatherLeonardPC.com
2/24/23 10:20	RE: Key v Dynamic - 1st MIL - Cureton as minister	Heather@HeatherLeonardPC.com
2/24/23 10:19	Key v Dynamic Security - Third MIL - EEOC Finding	Heather@HeatherLeonardPC.com
2/24/23 10:03	Key v Dynamic - Plaintiff's Second Motion in Limine - Dismissed Claims (f	Heather@HeatherLeonardPC.com
2/24/23 9:44	Key v Dynamic - 1st MIL - Cureton as minister	Heather@HeatherLeonardPC.com
2/23/23 16:28	2:19-cv-00767-ECM-SMD - Key v Dynamic - Revised Pretrial Order	Heather@HeatherLeonardPC.com
2/23/23 16:22	RE: Pretrial Order - 2023.02.22 (003) [IWOV-WSACTIVELLP.FID1997338]	Heather@HeatherLeonardPC.com
2/23/23 16:01	RE: Pretrial Order - 2023.02.22 (003) [IWOV-WSACTIVELLP.FID1997338]	WRedmond@fordharrison.com
2/23/23 16:00	RE: Pretrial Order - 2023.02.22 (003) [IWOV-WSACTIVELLP.FID1997338]	Heather@HeatherLeonardPC.com
2/23/23 15:58	Key v Dynamic - draft jury charges for your review	Heather@HeatherLeonardPC.com
2/23/23 15:43	Pretrial Order - 2023.02.22 (003) [IWOV-WSACTIVELLP.FID1997338]	WRedmond@fordharrison.com
2/23/23 14:36	RE: Key v Dynamic Security - framing of decision to remove Key from Hyu	Heather@HeatherLeonardPC.com
2/23/23 13:41	RE: Key v Dynamic Security - framing of decision to remove Key from Hyu	WRedmond@fordharrison.com
2/23/23 12:48	RE: Key v Dynamic Security - framing of decision to remove Key from Hyu	WRedmond@fordharrison.com
2/23/23 12:39	Key v Dynamic Security - framing of decision to remove Key from Hyundai	Heather@HeatherLeonardPC.com
2/23/23 12:12	RE: Key v Dynamic Security - revised pretrial order	Heather@HeatherLeonardPC.com
2/23/23 8:50	RE: Key v Dynamic - trial subpoena for Carolyn Williams	Heather@HeatherLeonardPC.com
2/23/23 8:21	Key v Dynamic - trial subpoena for Carolyn Williams	Heather@HeatherLeonardPC.com
2/23/23 8:20	Key v Dynamic Trial - witness subpoenas	Heather@HeatherLeonardPC.com
2/22/23 12:07	Key v Dynamic Security - revised pretrial order	Heather@HeatherLeonardPC.com
2/22/23 8:54	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Or efile_notice@almd.uscourts.gov	

2/21/23 16:08	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Or	efile_notice@almd.uscourts.gov
2/21/23 9:38	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Mo	efile_notice@almd.uscourts.gov
2/21/23 6:32	Case	dmkey825@gmail.com
2/20/23 18:05	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Mo	efile_notice@almd.uscourts.gov
2/17/23 16:36	Key v. Dynamic - Motion to Extend Pretrial Deadlines	sbullock@fordharrison.com
2/16/23 21:57	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. De	efile_notice@almd.uscourts.gov
2/16/23 21:53	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Wi	efile_notice@almd.uscourts.gov
2/16/23 21:41	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Ex	efile_notice@almd.uscourts.gov
2/16/23 20:34	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. De	efile_notice@almd.uscourts.gov
2/16/23 20:31	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Ex	efile_notice@almd.uscourts.gov
2/16/23 17:59	RE: Pl Resp to Ex List	Heather@HeatherLeonardPC.com
2/16/23 17:08	For review: new secure message	communicate@smokeball.com
2/16/23 16:25	RE: Key v. Dynamic - Rest to depo designation objections	Heather@HeatherLeonardPC.com
2/16/23 15:46	Automatic reply: Key v. Dynamic - Rest to depo designation objections	Heather@HeatherLeonardPC.com
2/14/23 8:29	Key v HMMA	wbrown@lehrmiddlebrooks.com
2/11/23 12:37	Case	dmkey825@gmail.com
2/10/23 13:43	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Dynamic Security, Inc. Or	efile_notice@almd.uscourts.gov
2/10/23 12:56	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/10/23 11:47	Key v HMMA, HEA, Dynamic (2:19-cv-767-ECM-SMD) - pretrial order	Heather@HeatherLeonardPC.com
2/10/23 11:45	RE: Key v HMMA et al - version 4 of the pretrial order [IWOV-WSACTIVE	Heather@HeatherLeonardPC.com
2/10/23 11:41	RE: Key v HMMA et al - version 4 of the pretrial order [IWOV-WSACTIVE	wbrown@lehrmiddlebrooks.com
2/10/23 11:25	RE: Key v HMMA et al - version 4 of the pretrial order [IWOV-WSACTIVE	Heather@HeatherLeonardPC.com
2/10/23 11:18	RE: Key v HMMA et al - version 4 of the pretrial order [IWOV-WSACTIVE	mmiller@bradley.com
2/10/23 11:05	RE: Key v HMMA et al - version 4 of the pretrial order [IWOV-WSACTIVE	WRedmond@fordharrison.com
2/10/23 10:42	RE: Key v HMMA et al - version 4 of the pretrial order [IWOV-WSACTIVE	WRedmond@fordharrison.com
2/10/23 10:31	RE: Key v HMMA et al - version 4 of the pretrial order	Heather@HeatherLeonardPC.com
2/9/23 22:46	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/9/23 22:41	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/9/23 22:35	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/9/23 19:51	HMMA - our objections to Key and Burns Depo Designations	Heather@HeatherLeonardPC.com
2/9/23 18:58	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/9/23 18:26	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/9/23 18:20	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov

2/9/23 18:03	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/9/23 17:58	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/9/23 17:28	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/9/23 17:25	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/9/23 17:05	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/9/23 16:59	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/9/23 16:55	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/9/23 16:38	RE: HEA Depo Designation Response	Heather@HeatherLeonardPC.com
2/9/23 16:17	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/9/23 16:16	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/9/23 16:14	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/9/23 14:52	key v hmma - comparison of exhibit lists	Heather@HeatherLeonardPC.com
2/8/23 16:15	Key v HMMA - REVISED AND UPDATED objections to HMMA witness/exhi	Heather@HeatherLeonardPC.com
2/8/23 15:50	RE: Key v HMMA - No. 42 on HMMA's exhibit list	dmiddlebrooks@lehrmiddlebrooks.com
2/8/23 15:46	RE: Key v HMMA - No. 42 on HMMA's exhibit list	Heather@HeatherLeonardPC.com
2/8/23 15:45	RE: Key v HMMA - No. 42 on HMMA's exhibit list	dmiddlebrooks@lehrmiddlebrooks.com
2/8/23 15:45	Key v HMMA - objections to HMMA witness and exhibit list for your review	Heather@HeatherLeonardPC.com
2/8/23 15:40	Key v HMMA - No. 42 on HMMA's exhibit list	Heather@HeatherLeonardPC.com
2/8/23 14:27	errata	Heather@HeatherLeonardPC.com
2/8/23 14:20	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/8/23 12:41	Key v HMMA, et al - Objections to Dynamic's exhibit list for your review, r	Heather@HeatherLeonardPC.com
2/8/23 10:10	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/7/23 16:53	Key v HMMA - objections to HEA Exhibit list for your review, revision, and	Heather@HeatherLeonardPC.com
2/7/23 13:27	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/7/23 13:15	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/7/23 12:28	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/7/23 10:06	RE: Key v HMMA et al - version 4 of the pretrial order	wbrown@lehrmiddlebrooks.com
2/7/23 8:33	RE: Key v HMMA et al - version 4 of the pretrial order	Heather@HeatherLeonardPC.com
2/7/23 5:01	Case	dmkey825@gmail.com
2/3/23 14:42	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/3/23 13:12	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/3/23 13:11	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/3/23 10:02	RE: Key v HMMA et al - version 4 of the pretrial order	Heather@HeatherLeonardPC.com

2/3/23 9:58	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/3/23 9:57	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/2/23 18:33	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/2/23 16:26	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/2/23 16:21	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/2/23 14:21	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/2/23 13:32	Re: Key v HMMA, HEA, Dynamic - HEA leave to file amended exhibit list	WRedmond@fordharrison.com
2/2/23 13:32	Re: Key v HMMA, HEA, Dynamic - HEA leave to file amended exhibit list	WRedmond@fordharrison.com
2/2/23 13:31	Re: Key v HMMA, HEA, Dynamic - HEA leave to file amended exhibit list	WRedmond@fordharrison.com
2/2/23 13:29	RE: Key v HMMA, HEA, Dynamic - HEA leave to file amended exhibit list	dmiddlebrooks@lehrmiddlebrooks.com
2/2/23 13:22	RE: Key v HMMA, HEA, Dynamic - HEA leave to file amended exhibit list	mmiller@bradley.com
2/2/23 11:18	RE: Key- exhibits I can't find	reception@HeatherLeonardPC.com
2/2/23 11:14	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/1/23 13:28	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/1/23 13:28	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
2/1/23 9:53	RE: Key v HMMA, HEA, Dynamic - leave to file amended exhibit list	WRedmond@fordharrison.com
2/1/23 9:47	RE: Key v HMMA, HEA, Dynamic - leave to file amended exhibit list	mmiller@bradley.com
1/31/23 16:00	Key v HMMA, HEA, Dynamic - leave to file amended exhibit list	wbrown@lehrmiddlebrooks.com
1/31/23 15:36	Re: Case	dmkey825@gmail.com
1/31/23 9:46	Re: Case	Heather@HeatherLeonardPC.com
1/30/23 13:57	FW: Key- exhibits I can't find	Heather@HeatherLeonardPC.com
1/30/23 11:50	Re: Case	dmkey825@gmail.com
1/30/23 11:35	RE: Case	Heather@HeatherLeonardPC.com
1/30/23 11:15	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/30/23 10:55	Re: Case	dmkey825@gmail.com
1/30/23 9:27	RE: Case	Heather@HeatherLeonardPC.com
1/29/23 14:47	Case	dmkey825@gmail.com
1/27/23 16:54	Key v. Hyundai Motor Manufacturing Alabama, LLC Amended Exhibit List	WRedmond@fordharrison.com
1/27/23 16:54	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/27/23 11:58	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/27/23 10:42	RE: Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manuf	WRedmond@fordharrison.com
1/27/23 8:39	RE: Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manuf	mmiller@bradley.com
1/26/23 21:26	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov

1/26/23 21:05	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/26/23 21:04	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/26/23 18:23	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/26/23 18:04	Davita Key v. Dynamic Security, Inc.	CMcCloyn@fordharrison.com
1/26/23 17:41	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/26/23 17:38	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/26/23 17:02	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/26/23 17:02	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/26/23 17:01	D. Key v. HMMA, et al. HEA's unredacted witness list	mmiller@bradley.com
1/26/23 16:15	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/26/23 16:14	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/26/23 16:03	D. Key v. HMMA, et al.	jhix@lehrmiddlebrooks.com
1/26/23 16:01	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/26/23 14:27	RE: Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manuf	dmiddlebrooks@lehrmiddlebrooks.com
1/26/23 14:20	RE: Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manuf	mmiller@bradley.com
1/25/23 14:28	RE: Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manuf	dmiddlebrooks@lehrmiddlebrooks.com
1/25/23 11:54	RE: Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manuf	WRedmond@fordharrison.com
1/25/23 11:52	Automatic reply: Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai	Heather@HeatherLeonardPC.com
1/25/23 11:32	FW: Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manu	mmiller@bradley.com
1/25/23 10:59	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/24/23 11:49	RE: Pettaway v Finley Trial Setting March 27 (Key v HMMA/HEA/Dynamic	Heather@HeatherLeonardPC.com
1/24/23 10:45	Key v HMMA et al - version 4 of the pretrial order	Heather@HeatherLeonardPC.com
1/24/23 10:34	Pettaway v Finley Trial Setting March 27 (Key v HMMA/HEA/Dynamic)	Heather@HeatherLeonardPC.com
1/24/23 10:00	RE: Key v HMMA, HEA, Dynamic - pretrial order - version two	Heather@HeatherLeonardPC.com
1/24/23 9:58	RE: Key v HMMA, HEA, Dynamic - pretrial order - version two	wbrown@lehrmiddlebrooks.com
1/24/23 9:51	RE: Key v HMMA, HEA, and Dynamic - pretrial order	wbrown@lehrmiddlebrooks.com
1/23/23 15:49	Key v HMMA, HEA, and Dynamic - pretrial order	Heather@HeatherLeonardPC.com
1/19/23 15:42	RE: Key v HMMA, HEA, Dynamic - pretrial order - version two	Heather@HeatherLeonardPC.com
1/19/23 15:40	RE: Key v HMMA, HEA, Dynamic - pretrial order - version two	wbrown@lehrmiddlebrooks.com
1/19/23 14:43	Key v HMMA, HEA, Dynamic - pretrial order - version two	Heather@HeatherLeonardPC.com
1/19/23 12:20	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/18/23 16:20	RE: Key v HMMA Et al - Resp to Dynamic Jury Strike Motion	Heather@HeatherLeonardPC.com
1/18/23 11:39	RE: KEY v HMMA, HEA and Dynamic Security	mmiller@bradley.com

1/17/23 21:45	RE: KEY v HMMA, HEA and Dynamic Security [IWOV-WSACTIVELLP.FID195	WRedmond@fordharrison.com
1/17/23 21:24	Re: KEY v HMMA, HEA and Dynamic Security	sbullock@fordharrison.com
1/17/23 19:52	RE: KEY v HMMA, HEA and Dynamic Security	mmiller@bradley.com
1/17/23 18:21	RE: KEY v HMMA, HEA and Dynamic Security	Heather@HeatherLeonardPC.com
1/17/23 18:11	KEY v HMMA, HEA and Dynamic Security	dmiddlebrooks@lehrmiddlebrooks.com
1/12/23 15:57	RE: Key v HMMA - pretrial order - very rough draft 1 [IWOV-WSACTIVELLP	WRedmond@fordharrison.com
1/12/23 12:29	RE: Key v HMMA - pretrial order - very rough draft 1 [IWOV-WSACTIVELLP	WRedmond@fordharrison.com
1/12/23 12:14	RE: Key v HMMA - pretrial order - very rough draft 1 [IWOV-WSACTIVELLP	Heather@HeatherLeonardPC.com
1/12/23 12:08	RE: Key v HMMA - pretrial order - very rough draft 1 [IWOV-WSACTIVELLP	WRedmond@fordharrison.com
1/9/23 15:56	Re: Case	dmkey825@gmail.com
1/9/23 15:13	Key v HMMA - pretrial order - very rough draft 1	Heather@HeatherLeonardPC.com
1/9/23 12:53	Heather Leonard P.C. has sent you a new Communicate message	communicate@smokeball.com
1/6/23 19:39	Re: Case	dmkey825@gmail.com
1/5/23 14:29	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/5/23 11:29	Heather Leonard P.C. has sent you a new Communicate message	communicate@smokeball.com
11/30/22 15:39	Automatic reply: Case	Heather@HeatherLeonardPC.com
11/30/22 6:29	Case	dmkey825@gmail.com
11/22/22 14:39	Hyundai	dmkey825@gmail.com
11/22/22 14:35	Watch Hyundai Assembly Line Manager Made Black Workers Call Him 'M	dmkey825@gmail.com
11/15/22 0:02	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
11/14/22 23:24	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
11/10/22 20:21	RE: Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing A	wbrown@lehrmiddlebrooks.com
11/10/22 17:29	Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufacturing Alaba	lhawkins@bradley.com
11/10/22 16:43	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
11/10/22 15:10	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
11/10/22 8:13	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
11/9/22 16:04	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
11/9/22 14:54	RE: Consent for extension for Dynamic to file reply to Ms. Key's oppositi	sbullock@fordharrison.com
11/9/22 14:12	RE: Consent for extension for Dynamic to file reply to Ms. Key's oppositi	sbullock@fordharrison.com
11/9/22 14:07	Consent for extension for Dynamic to file reply to Ms. Key's opposition to	sbullock@fordharrison.com
11/3/22 19:29	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
11/3/22 19:06	conclusion	Heather@HeatherLeonardPC.com
11/3/22 15:41	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov

11/3/22 13:27	Re: Final Affidavit	dmkey825@gmail.com
11/2/22 19:49	Re: Draft Declaration - DO NOT SIGN JUST REVIEW	dmkey825@gmail.com
11/2/22 16:51	Key Brief so far	Heather@HeatherLeonardPC.com
11/1/22 17:30	Re: Draft Declaration - DO NOT SIGN JUST REVIEW	dmkey825@gmail.com
10/31/22 16:10	RE: Key	Heather@HeatherLeonardPC.com
10/31/22 9:23	RE: Key	Heather@HeatherLeonardPC.com
10/30/22 9:18	RE: Key	Heather@HeatherLeonardPC.com
10/30/22 8:58	RE: Key	Heather@HeatherLeonardPC.com
10/28/22 15:02	Re: Key v HMMA/Dynamic update	dmkey825@gmail.com
10/27/22 12:03	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
10/27/22 8:48	FW: Citation Check Chart - completed (KEY)	Heather@HeatherLeonardPC.com
10/25/22 15:12	JOB 11766 Transcript Files Kristal Riddle	info@citedepos.com
10/25/22 10:08	Re: Case	dmkey825@gmail.com
10/25/22 9:13	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
10/25/22 6:27	Case	dmkey825@gmail.com
10/24/22 13:21	Key - Opposition to motion to supplement	Heather@HeatherLeonardPC.com
10/20/22 16:41	Etrans for Key - these are the only transcripts I've got	Heather@HeatherLeonardPC.com
10/20/22 14:03	JOB 11766 Transcript Files Sherry Spiers	info@citedepos.com
10/20/22 9:49	RE: Answers	Heather@HeatherLeonardPC.com
10/19/22 20:27	Answers	dmkey825@gmail.com
10/19/22 10:34	JOB 11766 Transcript Files Sherry Spiers	info@citedepos.com
10/19/22 10:34	JOB 11766 Transcript Files Kristal Riddle	info@citedepos.com
10/18/22 11:43	Key MSJ Response - section objecting to Robinson's declaration	Heather@HeatherLeonardPC.com
10/18/22 11:32	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
10/13/22 16:53	RE: HMMA's Motion for Summary Judgment	Heather@HeatherLeonardPC.com
10/13/22 14:48	HEA and Dynamic Brief's fact sections for you to type in your response	Heather@HeatherLeonardPC.com
10/13/22 14:39	Heather Leonard P.C. has sent you a new Communicate message	communicate@smokeball.com
10/13/22 14:24	RE: HMMA's Motion for Summary Judgment	Heather@HeatherLeonardPC.com
10/13/22 13:14	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
10/13/22 13:10	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
10/12/22 23:19	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
10/12/22 23:01	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
10/12/22 23:00	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov

10/12/22 18:37	Hyundai ENG America, Inc._Key - Letter to Judge Marks enc. Courtesy Cop lhawkins@bradley.com	
10/12/22 17:32	RE: HMMA's Motion for Summary Judgment	Heather@HeatherLeonardPC.com
10/12/22 17:26	Heather Leonard P.C. has sent you a new Communicate message	communicate@smokeball.com
10/12/22 17:11	HMMA's Motion for Summary Judgment	Heather@HeatherLeonardPC.com
10/12/22 16:17	Key v. HMMA et al - HEA SJ Filings	cbond@bradley.com
10/12/22 16:16	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
10/12/22 16:10	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
10/12/22 15:53	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
10/12/22 15:44	RE: Key v. HMMA	dmiddlebrooks@lehrmiddlebrooks.com
10/12/22 15:38	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
10/12/22 15:35	Re: Law360 inquiry re: Key v. Hyundai Motor Manufacturing Alabama LLC	patrick.hoff@law360.com
10/12/22 15:34	RE: Law360 inquiry re: Key v. Hyundai Motor Manufacturing Alabama LLC	Heather@HeatherLeonardPC.com
10/12/22 15:34	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
10/12/22 15:29	Automatic reply: Key v. HMMA	wbrown@lehrmiddlebrooks.com
10/12/22 13:20	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
10/12/22 13:14	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
10/12/22 13:13	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
10/11/22 13:34	Key v. HMMA	wbrown@lehrmiddlebrooks.com
10/11/22 10:45	RE: Key v Dynamic - Spiers deposition to summarize	Heather@HeatherLeonardPC.com
10/3/22 14:05	Heather Leonard P.C. has sent you a new Communicate message	communicate@smokeball.com
10/2/22 21:38	Re: Case	dmkey825@gmail.com
10/1/22 10:19	RE: Key depo- Carolyn Williams	Heather@HeatherLeonardPC.com
10/1/22 10:11	FW: Key depo- Carolyn Williams	Heather@HeatherLeonardPC.com
9/28/22 15:38	Invoice 20254 from Cite, LLC -- In the Matter of: State of Alabama Hearir	info@citedepos.com
9/28/22 15:36	JOB 12169 Transcript Files Unemployment Hearing	info@citedepos.com
9/28/22 9:29	Invoice 20266 from Cite, LLC -- In the Matter of: Key v. Hyundai Motor Ma	info@citedepos.com
9/28/22 9:19	JOB 11766 Transcript Files Sherry Spiers	info@citedepos.com
9/28/22 8:57	JOB 11766 Transcript Files Kristal Riddle	info@citedepos.com
9/25/22 9:06	Case	dmkey825@gmail.com
9/23/22 13:14	Heather Leonard P.C. has sent you a new Communicate message	communicate@smokeball.com
9/21/22 16:25	Activity in Case 2:22-cv-00505-MHH Key v. Hyundai Motor Manufacturing	cmecf_ALND@alnd.uscourts.gov
9/16/22 11:35	Activity in Case 2:22-cv-00505-MHH Key v. Hyundai Motor Manufacturing	cmecf_ALND@alnd.uscourts.gov
9/15/22 13:16	RE: Unemployment Hearing Transcription	info@citedepos.com

9/15/22 13:09	Activity in Case 2:22-cv-00505-MHH Key v. Hyundai Motor Manufacturing	cmecf_ALND@alnd.uscourts.gov
9/15/22 12:20	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
9/15/22 12:17	RE: Key v HMMA, HEA, and Dynamic - Notice Concerning Settlement and	Heather@HeatherLeonardPC.com
9/14/22 16:51	RE: Unemployment Hearing Transcription	info@citedepos.com
9/14/22 16:43	Re: Unemployment Hearing Transcription	info@citedepos.com
9/13/22 13:33	Re: Audio recording transcript	tanyarpr@aol.com
9/13/22 10:59	Fwd: Mailroom position	dmkey825@gmail.com
9/13/22 10:50	Re: Case	dmkey825@gmail.com
9/12/22 17:01	RE: Key - unemployment hearing	Heather@HeatherLeonardPC.com
9/12/22 16:51	Automatic reply: Key - unemployment hearing	Heather@HeatherLeonardPC.com
9/7/22 18:00	RE: Key v HMMA, HEA, and Dynamic - Notice Concerning Settlement and	mmiller@bradley.com
9/7/22 16:53	RE: Key v HMMA, HEA, and Dynamic - Notice Concerning Settlement and	Heather@HeatherLeonardPC.com
9/7/22 16:38	Re: Key v HMMA, HEA, and Dynamic - Notice Concerning Settlement and	wbrown@lehrmiddlebrooks.com
9/7/22 16:05	Key v HMMA, HEA, and Dynamic - Notice Concerning Settlement and Mec	Heather@HeatherLeonardPC.com
9/7/22 10:54	Re: Case	dmkey825@gmail.com
9/7/22 10:53	Re: Case	dmkey825@gmail.com
9/6/22 20:33	Re: Case	dmkey825@gmail.com
9/2/22 15:14	Re: Case	dmkey825@gmail.com
9/2/22 14:22	RE: Key v. Dynamic et al - Dynamic production 635-3283 [IWOV-WSACTIV	SHolland@fordharrison.com
9/2/22 14:20	Stephanie Holland has shared the folder 'Dynamic – Key – Production to P	mail@sf-notifications.com
9/2/22 13:42	Activity in Case 2:22-cv-00505-MHH Key v. Hyundai Motor Manufacturing	cmecf_ALND@alnd.uscourts.gov
9/2/22 13:37	Activity in Case 2:22-cv-00505-MHH Key v. Hyundai Motor Manufacturing	cmecf_ALND@alnd.uscourts.gov
9/2/22 12:45	Deposition on Tuesday	mmiller@bradley.com
9/2/22 12:06	Automatic reply: settlement conference: Key v HMMA	dmiddlebrooks@lehrmiddlebrooks.com
9/2/22 10:38	settlement conference: Key v HMMA	wbrown@lehrmiddlebrooks.com
9/1/22 14:59	Re: Case	dmkey825@gmail.com
8/31/22 17:02	Automatic reply: Case	Heather@HeatherLeonardPC.com
8/31/22 16:14	Case	dmkey825@gmail.com
8/30/22 8:57	Re: Dynamic 30(b)(6) Deposition Exhibits [IWOV-WSACTIVELLP.FID19973	WRedmond@fordharrison.com
8/29/22 15:47	Re: Friday	tanyarpr@aol.com
8/26/22 20:38	Re: Case	dmkey825@gmail.com
8/26/22 14:26	Activity in Case 2:22-cv-00505-MHH Key v. Hyundai Motor Manufacturing	cmecf_ALND@alnd.uscourts.gov
8/26/22 9:08	Activity in Case 2:22-cv-00505-MHH Key v. Hyundai Motor Manufacturing	cmecf_ALND@alnd.uscourts.gov

8/26/22 7:40 Case	dmkey825@gmail.com
8/24/22 15:24 Activity in Case 2:22-cv-00505-MHH Key v. Hyundai Motor Manufacturing	cmecf_ALND@alnd.uscourts.gov
8/24/22 13:48 RE: D. Key v. HMMA, et al. Currenton depo time - 9:00 am [IWOV-WSACT WRedmond@fordharrison.com	
8/24/22 13:41 Re: D. Key v. HMMA, et al. Currenton depo time - 9:00 am [IWOV-WSACT wbrown@lehrmiddlebrooks.com	
8/24/22 13:24 Re: D. Key v. HMMA, et al. Currenton depo time - 9:00 am [IWOV-WSACT dmiddlebrooks@lehrmiddlebrooks.com	
8/24/22 13:17 RE: D. Key v. HMMA, et al. Currenton depo time - 9:00 am [IWOV-WSACT WRedmond@fordharrison.com	
8/24/22 13:13 RE: Please Confirm -- Job 11899 Video Deposition of Ray Cureton	info@citedepos.com
8/24/22 13:12 RE: Please Confirm -- Job 11899 Video Deposition of Ray Cureton	Heather@HeatherLeonardPC.com
8/24/22 13:09 RE: Please Confirm -- Job 11853 Video Deposition of Ray Cureton	info@citedepos.com
8/24/22 13:01 RE: Please Confirm -- Job 11853 Video Deposition of Ray Cureton	Heather@HeatherLeonardPC.com
8/24/22 13:00 RE: D. Key v. HMMA, et al. Currenton depo time - 9:00 am [IWOV-WSACT Heather@HeatherLeonardPC.com	
8/24/22 12:31 RE: D. Key v. HMMA, et al. Currenton depo time - 9:00 am [IWOV-WSACT mmiller@bradley.com	
8/24/22 12:28 RE: D. Key v. HMMA, et al. Currenton depo time - 9:00 am [IWOV-WSACT WRedmond@fordharrison.com	
8/24/22 8:48 RE: Please Confirm -- Job 11853 Video Deposition of Ray Cureton	info@citedepos.com
8/24/22 8:36 RE: Please Confirm -- Job 11853 Video Deposition of Ray Cureton	Heather@HeatherLeonardPC.com
8/23/22 17:41 Re: Please Confirm -- Job 11853 Video Deposition of Ray Cureton	info@citedepos.com
8/23/22 17:20 RE: D. Key v. HMMA, et al. Currenton depo time - 9:00 am [IWOV-WSACT WRedmond@fordharrison.com	
8/23/22 17:16 RE: Please Confirm -- Job 11853 Video Deposition of Ray Cureton	Heather@HeatherLeonardPC.com
8/23/22 17:15 RE: D. Key v. HMMA, et al. Currenton depo time - 9:00 am	Heather@HeatherLeonardPC.com
8/23/22 17:06 RE: D. Key v. HMMA, et al. Currenton depo time [IWOV-WSACTIVELLP.FID Heather@HeatherLeonardPC.com	
8/23/22 16:59 RE: D. Key v. HMMA, et al. Currenton depo time [IWOV-WSACTIVELLP.FID WRedmond@fordharrison.com	
8/23/22 16:52 RE: Deposition	Heather@HeatherLeonardPC.com
8/23/22 16:44 Deposition	dmkey825@gmail.com
8/23/22 15:08 RE: D. Key v. HMMA, et al.	jhix@lehrmiddlebrooks.com
8/23/22 13:45 RE: D. Key v. HMMA, et al. Currenton depo time	WRedmond@fordharrison.com
8/23/22 12:04 D. Key v. HMMA, et al.	jhix@lehrmiddlebrooks.com
8/22/22 17:25 Key v. HMMA, HEA, and Dynamic - Defendant Dynamic's Third Amended I	SHolland@fordharrison.com
8/22/22 16:20 Your letter of August 10, 2022	dmiddlebrooks@lehrmiddlebrooks.com
8/22/22 15:36 FW: Activity in Case 2:22-cv-00505-MHH Key v. Hyundai Motor Manufactu	Heather@HeatherLeonardPC.com
8/22/22 13:02 Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
8/22/22 10:43 D. Key v. HMMA	jhix@lehrmiddlebrooks.com
8/22/22 10:04 Key v HMMA, HEA, Dynamic - deposition notice for HEA 30(b)(6)/William:	Heather@HeatherLeonardPC.com
8/22/22 8:55 Key v HMMA, HEA, and Dynamic - Cureton renote and subpoena	Heather@HeatherLeonardPC.com

8/22/22 8:51	RE: Job Cancellation -- Job 11756 Video Deposition of Ray Cureton	info@citedepos.com
8/22/22 8:46	RE: Job Cancellation -- Job 11756 Video Deposition of Ray Cureton	Heather@HeatherLeonardPC.com
8/19/22 14:56	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
8/19/22 14:20	FW: Dynamic / Key - Defendant's Document Production [IWOV-WSACTIVI	Heather@HeatherLeonardPC.com
8/19/22 14:13	RE: Key v HMMA, HEA, and Dynamic - motion to take Williams/HEA 30(b)	Heather@HeatherLeonardPC.com
8/19/22 14:12	RE: HEA - PRODUCTION	Heather@HeatherLeonardPC.com
8/19/22 14:12	Re: Key v HMMA, HEA, and Dynamic - motion to take Williams/HEA 30(b)	dmiddlebrooks@lehrmiddlebrooks.com
8/19/22 14:10	RE: Key v HMMA, HEA, and Dynamic - motion to take Williams/HEA 30(b)	Heather@HeatherLeonardPC.com
8/19/22 14:09	RE: Key v HMMA, HEA, and Dynamic - motion to take Williams/HEA 30(b)	dmiddlebrooks@lehrmiddlebrooks.com
8/19/22 13:07	Key v HMMA, HEA, and Dynamic - motion to take Williams/HEA 30(b)(6)	Heather@HeatherLeonardPC.com
8/19/22 11:38	RE: Scheduling Request: Heather Leonard, PC	Heather@HeatherLeonardPC.com
8/19/22 11:38	RE: Please Confirm -- Job 11756 Video Deposition of Ray Cureton	Heather@HeatherLeonardPC.com
8/19/22 11:17	Key v. HMMA, LLC	jhix@lehrmiddlebrooks.com
8/19/22 11:16	Key v HMMA - EEOC filings in ND AL	Heather@HeatherLeonardPC.com
8/19/22 8:27	Dynamic	Heather@HeatherLeonardPC.com
8/18/22 17:14	HEA - PRODUCTION	mmiller@bradley.com
8/18/22 16:28	RE: Key v. HMMA, HEA, and Dynamic - 30(b)(6) Notice to Dynamic [IWOV	SHolland@fordharrison.com
8/18/22 15:37	RE: Key v. HMMA, HEA, and Dynamic - 30(b)(6) Notice to Dynamic [IWOV	WRedmond@fordharrison.com
8/18/22 15:21	Dynamic - Key - Dynamic Security, Inc.'s Amended Objections to Re-Notic	CMcCloyn@fordharrison.com
8/18/22 14:50	RE: Dynamic - Key - Dynamic Security, Inc.'s Amended Objections to Re-N	Heather@HeatherLeonardPC.com
8/18/22 14:49	RE: Dynamic - Key - Dynamic Security, Inc.'s Amended Objections to Re-N	wbrown@lehrmiddlebrooks.com
8/18/22 14:37	Dynamic - Key - Dynamic Security, Inc.'s Amended Objections to Re-Notic	CMcCloyn@fordharrison.com
8/18/22 14:03	RE: Dynamic 30(b)(6) Deposition Exhibits [IWOV-WSACTIVELLP.FID19973	WRedmond@fordharrison.com
8/18/22 13:58	Order Ready for Pickup #263136745-001	noreply_ec@odpbusiness.com
8/18/22 12:11	RE: Depo Exhibits	Heather@HeatherLeonardPC.com
8/18/22 12:08	RE: Depo Exhibits	Heather@HeatherLeonardPC.com
8/18/22 12:05	Depo Exhibits	Heather@HeatherLeonardPC.com
8/18/22 11:13	RE: Please Confirm -- Job 11766 Deposition of 30(b)(6) for Dynamic Sec	info@citedepos.com
8/18/22 11:08	RE: Key v HMMA, HEA, and Dynamic - deposition scheduling call summar	Heather@HeatherLeonardPC.com
8/18/22 11:07	Re: Key v HMMA, HEA, and Dynamic - deposition scheduling call summar	mmiller@bradley.com
8/18/22 10:31	RE: Key v HMMA, HEA, and Dynamic - deposition scheduling call summar	Heather@HeatherLeonardPC.com
8/18/22 8:24	Please Confirm -- Job 11766 Deposition of 30(b)(6) for Dynamic Security	info@citedepos.com
8/17/22 18:11	RE: Key v. HMMA, HEA, and Dynamic - 30(b)(6) Notice to Dynamic [IWOV	WRedmond@fordharrison.com

8/17/22 15:18	Re: Deposition	dmkey825@gmail.com
8/17/22 13:28	Re: Key v. HMMA, HEA, and Dynamic - 30(b)(6) Notice to Dynamic [IWOV WRedmond@fordharrison.com	
8/17/22 12:10	Automatic reply: Key v. HMMA, HEA, and Dynamic - 30(b)(6) Notice to Dynamic [Heather@HeatherLeonardPC.com	
8/16/22 20:51	Deposition	dmkey825@gmail.com
8/15/22 16:51	RE: Key v HMMA, HEA, and Dynamic - 30(b)(6) Notice to HEA	mmiller@bradley.com
8/15/22 15:50	Re: Friday	tanyarpr@aol.com
8/15/22 15:44	Friday	tanyarpr@aol.com
8/15/22 14:07	RE: Key v HMMA, HEA, and Dynamic - 30(b)(6) Notice to HEA	Heather@HeatherLeonardPC.com
8/15/22 14:06	Cureton Subpoena	Heather@HeatherLeonardPC.com
8/15/22 11:52	Key v HMMA, HEA, Dynamic	Heather@HeatherLeonardPC.com
8/15/22 11:48	RE: Key - Updated Damages Spreadsheet and doc index	Heather@HeatherLeonardPC.com
8/15/22 11:20	RE: Key - Updated Damages Spreadsheet and doc index	Heather@HeatherLeonardPC.com
8/15/22 11:19	RE: Key v HMMA, HEA, and Dynamic - deposition scheduling call summary [wbrown@lehrmiddlebrooks.com	
8/15/22 11:13	RE: Key v HMMA, HEA, and Dynamic - deposition scheduling call summary [Heather@HeatherLeonardPC.com	
8/15/22 11:11	Key v Dynamic Security - settlement communication	Heather@HeatherLeonardPC.com
8/12/22 12:54	Automatic reply: Key - Updated Damages Spreadsheet and doc index	Heather@HeatherLeonardPC.com
8/12/22 11:52	RE: Key - Updated Damages Spreadsheet and doc index	Heather@HeatherLeonardPC.com
8/11/22 10:47	Key v Dynamic - draft settlement letter for your review and revision	Heather@HeatherLeonardPC.com
8/10/22 17:30	Re: Scheduling Request: Palmer Law, LLC	Heather@HeatherLeonardPC.com
8/10/22 16:21	Please Confirm -- Job 11766 Video Deposition of 30(b)(6) for Dynamic Security [info@citedepos.com	
8/10/22 16:21	RE: Scheduling Request: Palmer Law, LLC	info@citedepos.com
8/10/22 13:03	FW: Scheduling Request: Heather Leonard, PC	Heather@HeatherLeonardPC.com
8/10/22 12:51	RE: Davita Damages	Heather@HeatherLeonardPC.com
8/10/22 12:06	RE: Key v. HMMA et al - HMMA post depo deficiency	Heather@HeatherLeonardPC.com
8/10/22 11:57	RE: Key v. HMMA et al - HMMA post depo deficiency	Heather@HeatherLeonardPC.com
8/9/22 22:21	Key v. Dynamic Security, Inc., et al./Second Amended Initial Disclosures [I WRedmond@fordharrison.com	
8/9/22 17:27	Re: Case Status update	dmkey825@gmail.com
8/9/22 15:26	Re: Case Status update	dmkey825@gmail.com
8/9/22 12:37	Key v HMMA, HEA, and Dynamic - Notice for Ray Cureton's Deposition	Heather@HeatherLeonardPC.com
8/9/22 12:14	RE: Key v. Dynamic Security, Inc. [IWOV-WSACTIVE LLP.FID1997338]	Heather@HeatherLeonardPC.com
8/9/22 12:12	Key v. Dynamic Security, Inc. [IWOV-WSACTIVE LLP.FID1997338]	WRedmond@fordharrison.com
8/9/22 11:54	Key v HMMA, HEA, and Dynamic - deposition scheduling call summary	Heather@HeatherLeonardPC.com
8/8/22 17:02	RE: Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE	Heather@HeatherLeonardPC.com

8/8/22 17:01	Re: Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE WRedmond@fordharrison.com
8/8/22 16:09	RE: Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE dmiddlebrooks@lehrmiddlebrooks.com
8/8/22 16:09	RE: Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE Heather@HeatherLeonardPC.com
8/8/22 16:01	RE: Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE mmiller@bradley.com
8/8/22 15:58	RE: Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE Heather@HeatherLeonardPC.com
8/8/22 15:55	RE: Key v HMMA, HEA, and Dynamic - 30(b)(6) Notice to HEA Heather@HeatherLeonardPC.com
8/8/22 15:52	RE: Key v. HMMA, HEA, and Dynamic - 30(b)(6) Notice to Dynamic [IWOV Heather@HeatherLeonardPC.com
8/8/22 15:49	RE: Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE dmiddlebrooks@lehrmiddlebrooks.com
8/8/22 15:39	RE: Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE Heather@HeatherLeonardPC.com
8/8/22 15:32	RE: Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE mmiller@bradley.com
8/8/22 15:29	RE: Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE Heather@HeatherLeonardPC.com
8/8/22 15:27	RE: Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE dmiddlebrooks@lehrmiddlebrooks.com
8/8/22 15:15	Automatic reply: Key v HMMA, HEA and Dynamic - Deposition Dates [IWC Heather@HeatherLeonardPC.com
8/8/22 15:15	Automatic reply: Key v HMMA, HEA and Dynamic - Deposition Dates [IWC CMcCloyn@fordharrison.com
8/5/22 12:12	RE: Key v. Hyundai et al - Nicole Scavella Statement Heather@HeatherLeonardPC.com
8/1/22 16:55	https://www.wsfa.com/2022/08/01/suit-filed-amid-hyundai-supplier-chi dmkey825@gmail.com
7/29/22 16:43	Automatic reply: Key v HMMA, HEA and Dynamic - Deposition Dates [IWC mmiller@bradley.com
7/29/22 15:50	RE: Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE dmiddlebrooks@lehrmiddlebrooks.com
7/29/22 15:45	RE: Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE WRedmond@fordharrison.com
7/28/22 12:14	JOB 11184 Transcript Files Robert Burns info@citedepos.com
7/27/22 14:17	Davita Key v. HMMA, et al etaylor@lehrmiddlebrooks.com
7/25/22 16:41	Re: Case dmkey825@gmail.com
7/25/22 12:02	Case dmkey825@gmail.com
7/22/22 16:02	RE: Key v HMMA, HEA and Dynamic - Deposition Dates dmiddlebrooks@lehrmiddlebrooks.com
7/22/22 15:59	RE: Key v HMMA, HEA and Dynamic - Deposition Dates [IWOV-WSACTIVE WRedmond@fordharrison.com
7/22/22 15:43	RE: Key v HMMA, HEA and Dynamic - Deposition Dates Heather@HeatherLeonardPC.com
7/22/22 15:39	RE: Key v HMMA, HEA and Dynamic - Deposition Dates mmiller@bradley.com
7/22/22 15:31	RE: Key v HMMA, HEA and Dynamic - Deposition Dates Heather@HeatherLeonardPC.com
7/22/22 10:33	FW: Key Deposition to Summarize - HMMA 30(b)(6) Robert Burns Heather@HeatherLeonardPC.com
7/20/22 8:06	Key v HMMA, HEA and Dynamic - Deposition Dates Heather@HeatherLeonardPC.com
7/12/22 13:32	Hair Discrimination Research memo Heather@HeatherLeonardPC.com
7/11/22 13:08	FW: Key, Davita - deposition to summarize Heather@HeatherLeonardPC.com
7/11/22 13:01	Re: https://www.wsfa.com/2022/07/08/director-alabama-hyundai-plant dmkey825@gmail.com

7/11/22 11:37	Automatic reply: https://www.wsfa.com/2022/07/08/director-alabama-	Heather@HeatherLeonardPC.com
7/8/22 17:33	https://www.wsfa.com/2022/07/08/director-alabama-hyundai-plant-cla	dmkey825@gmail.com
7/7/22 10:45	Case	dmkey825@gmail.com
7/7/22 8:20	Heather Leonard P.C. has sent you a new Communicate message	communicate@smokeball.com
7/6/22 14:12	RE: JOB 11184 Transcript Files Robert Burns	Heather@HeatherLeonardPC.com
7/6/22 11:49	Invoice 19091 from Cite, LLC -- In the Matter of: Key v. Hyundai Motor Ma	info@citedepos.com
6/28/22 7:29	Employment	dmkey825@gmail.com
6/27/22 12:20	Re: Hair Pictures	dmkey825@gmail.com
6/27/22 10:18	Re: Hair Pictures	dmkey825@gmail.com
6/25/22 5:50	Pictures	dmkey825@gmail.com
6/25/22 5:48	Case	dmkey825@gmail.com
6/24/22 19:11	Case	dmkey825@gmail.com
6/24/22 16:59	Case	dmkey825@gmail.com
6/24/22 11:19	Hair Pictures	dmkey825@gmail.com
6/23/22 15:32	Re: Case	dmkey825@gmail.com
6/22/22 17:26	Case	dmkey825@gmail.com
6/22/22 11:42	Re: Deposition of Corp Rep	WRedmond@fordharrison.com
6/22/22 9:18	Deposition of Corp Rep	info@citedepos.com
6/21/22 16:06	Case	dmkey825@gmail.com
6/21/22 15:37	RE: Please Confirm -- Job 11184 Deposition of 30(b)(6)	Heather@HeatherLeonardPC.com
6/21/22 15:37	RE: Please Confirm -- Job 11184 Deposition of 30(b)(6)	Heather@HeatherLeonardPC.com
6/21/22 15:36	RE: Please Confirm -- Job 11184 Deposition of 30(b)(6)	info@citedepos.com
6/21/22 15:34	Deposition of Corp Rep	info@citedepos.com
6/21/22 15:34	Case	dmkey825@gmail.com
6/21/22 15:29	RE: Please Confirm -- Job 11184 Deposition of 30(b)(6)	Heather@HeatherLeonardPC.com
6/21/22 15:28	RE: Key v. HMMA et al - updated 30(b)(6) Depo Notice - HMMA - parking	Heather@HeatherLeonardPC.com
6/21/22 15:26	Re: Case	dmkey825@gmail.com
6/21/22 15:05	Case	dmkey825@gmail.com
6/21/22 14:59	Case	dmkey825@gmail.com
6/21/22 12:54	Re: Key v. HMMA et al - updated 30(b)(6) Depo Notice - HMMA - parking	dmiddlebrooks@lehrmiddlebrooks.com
6/21/22 12:16	Re: Key v. HMMA et al - updated 30(b)(6) Depo Notice - HMMA - parking	WRedmond@fordharrison.com
6/21/22 11:49	Re: Key v. HMMA et al - updated 30(b)(6) Depo Notice - HMMA - parking	WRedmond@fordharrison.com
6/21/22 11:46	Deposition	dmkey825@gmail.com

6/21/22 11:25	RE: Please Confirm -- Job 11184 Deposition of 30(b)(6)	info@citedepos.com
6/21/22 8:46	Please Confirm -- Job 11184 Deposition of 30(b)(6)	info@citedepos.com
6/20/22 19:48	Re: Key v. HMMA et al - updated 30(b)(6) Depo Notice - HMMA - parking	mmiller@bradley.com
6/20/22 18:02	Deposition	dmkey825@gmail.com
6/20/22 14:17	Heather Leonard P.C. has sent you a new Communicate message	communicate@smokeball.com
6/20/22 14:02	Key v HMMA, HEA, and Dynamic - exhibits for HMMA 30(b)(6) deposition	Heather@HeatherLeonardPC.com
6/20/22 13:29	Heather Leonard P.C. has sent you a new Communicate message	communicate@smokeball.com
6/20/22 13:14	Heather Leonard at Heather Leonard P.C. would like to securely share file:	communicate@smokeball.com
6/20/22 13:14	Exhibits for HMMA 30(b)(6)	Heather@HeatherLeonardPC.com
6/20/22 8:41	Re: Deposition	dmkey825@gmail.com
6/20/22 8:14	Re: COVID exposure	WRedmond@fordharrison.com
6/19/22 23:21	COVID exposure	dmiddlebrooks@lehrmiddlebrooks.com
6/19/22 22:27	Re: Key v. HMMA et al - updated 30(b)(6) Depo Notice - HMMA	WRedmond@fordharrison.com
6/19/22 20:48	Re: Key v. HMMA et al - updated 30(b)(6) Depo Notice - HMMA	WRedmond@fordharrison.com
6/19/22 18:55	Re: Deposition	dmkey825@gmail.com
6/19/22 16:08	Re: Deposition	dmkey825@gmail.com
6/19/22 14:04	RE: Deposition	Heather@HeatherLeonardPC.com
6/19/22 12:09	Deposition	dmkey825@gmail.com
6/16/22 13:05	RE: Key's deposition on Monday, June 20.	Heather@HeatherLeonardPC.com
6/16/22 8:41	Key's deposition on Monday, June 20.	dmiddlebrooks@lehrmiddlebrooks.com
6/14/22 14:08	Re: Key v. HMMA, HEA, Dynamic - All documents Produced	dmkey825@gmail.com
6/14/22 13:19	June 20th , 9:30 am deposition of Davita Key	dmiddlebrooks@lehrmiddlebrooks.com
6/14/22 12:42	Re: Key v. HMMA, HEA, Dynamic - All documents Produced	dmkey825@gmail.com
6/13/22 18:37	Re: Key v. HMMA, HEA, Dynamic - All documents Produced	dmkey825@gmail.com
6/13/22 17:32	Re: Key v. HMMA, HEA, Dynamic - All documents Produced	dmkey825@gmail.com
6/13/22 16:29	Automatic reply: Key v. HMMA et al - updated 30(b)(6) Depo Notice - HM	cbond@bradley.com
6/13/22 16:28	Automatic reply: Key v. HMMA et al - updated 30(b)(6) Depo Notice - HM	dmiddlebrooks@lehrmiddlebrooks.com
6/13/22 10:57	RE: Please Confirm -- Job 11184 Video Deposition of 30(b)(6)	info@citedepos.com
6/13/22 10:55	Please Confirm -- Job 11184 Video Deposition of 30(b)(6)	info@citedepos.com
6/13/22 9:52	RE: Conference Room Scheduling	info@citedepos.com
6/10/22 12:11	Automatic reply: Conference Room Scheduling	Heather@HeatherLeonardPC.com
6/10/22 11:01	RE: Conference Room Scheduling	info@citedepos.com
6/10/22 8:23	RE: Conference Room Scheduling	info@citedepos.com

6/9/22 17:20 Re: Conference Room Scheduling	info@citedepos.com
6/8/22 11:05 Pay Information	dmkey825@gmail.com
6/6/22 9:48 RE: Key	Heather@HeatherLeonardPC.com
6/6/22 8:53 RE: Key	dmiddlebrooks@lehrmiddlebrooks.com
6/3/22 16:07 RE: Key	dmiddlebrooks@lehrmiddlebrooks.com
6/3/22 12:50 RE: Key	dmiddlebrooks@lehrmiddlebrooks.com
6/3/22 12:42 RE: Key	Heather@HeatherLeonardPC.com
6/3/22 9:46 RE: Key	dmiddlebrooks@lehrmiddlebrooks.com
6/2/22 10:16 Voicemail from LEHR MIDDLEBROO at (205) 323-9262 on Jun 2 2022 10:1	noreply@voicemail.goto.com
5/26/22 7:59 FW: Key v HMMA, HEA and Dynamic	dmiddlebrooks@lehrmiddlebrooks.com
5/24/22 15:30 RE: [NELA-AL] : Reinstating Previously Dismissed Claim	Mail@ConnectedCommunity.org
5/24/22 15:23 RE: [NELA-AL] : Reinstating Previously Dismissed Claim	Mail@ConnectedCommunity.org
5/24/22 15:19 RE: [NELA-AL] : Reinstating Previously Dismissed Claim	Mail@ConnectedCommunity.org
5/24/22 15:08 RE: [NELA-AL] : Reinstating Previously Dismissed Claim	Mail@ConnectedCommunity.org
5/24/22 14:54 Re: Reinstating Previously Dismissed Claim	richardrussellnewton@gmail.com
5/24/22 14:25 [NELA-AL] : Reinstating Previously Dismissed Claim	Mail@ConnectedCommunity.org
5/23/22 22:01 Dynamic Security Objections to 30(b)(6) Notice [IWOV-WSACTIVELLP.FID W	Redmond@fordharrison.com
5/23/22 15:26 Key v. Dynamic et al discovery letter and documents	mmiller@bradley.com
5/23/22 8:25 Key v HMMA, HEA and Dynamic	dmiddlebrooks@lehrmiddlebrooks.com
5/16/22 10:54 Re: Davita Key v Hyundai/Dynamic Deposition Preparation Meeting	dmkey825@gmail.com
5/16/22 10:17 Key v HMMA, HEA, and Dynamic - your deposition is set June 20, 2022 at !	Heather@HeatherLeonardPC.com
5/13/22 15:54 D. Key v. HMMA, et al.	jhix@lehrmiddlebrooks.com
5/12/22 15:08 RE: Key v HMMA, HEA and Dynamic - follow up on deposition scheduling	dmiddlebrooks@lehrmiddlebrooks.com
5/12/22 15:05 RE: Key v HMMA, HEA and Dynamic - follow up on deposition scheduling	Heather@HeatherLeonardPC.com
5/12/22 12:22 RE: Key v HMMA, HEA and Dynamic - follow up on deposition scheduling	dmiddlebrooks@lehrmiddlebrooks.com
5/12/22 11:56 RE: Key v HMMA, HEA and Dynamic - follow up on deposition scheduling	Heather@HeatherLeonardPC.com
5/12/22 11:49 Re: Key v HMMA, HEA and Dynamic - follow up on deposition scheduling	dmiddlebrooks@lehrmiddlebrooks.com
5/12/22 11:43 RE: Key v HMMA, HEA and Dynamic - follow up on deposition scheduling	Heather@HeatherLeonardPC.com
5/12/22 11:40 RE: Case	Heather@HeatherLeonardPC.com
5/12/22 11:35 RE: Key v HMMA, HEA and Dynamic - follow up on deposition scheduling	mmiller@bradley.com
5/11/22 15:52 Dale Bunting has shared the folder 'Dynamic - Key – Production to Plaintiff	mail@sf-notifications.com
5/11/22 15:52 Dale Bunting has shared the folder 'Dynamic - Key – Production to Plaintiff	mail@sf-notifications.com
5/11/22 15:39 Dynamic / Davita Key	CMcCloyn@fordharrison.com

5/10/22 9:13 Case	dmkey825@gmail.com
5/9/22 16:36 D. Key v. HMMA, et al.	jhix@lehrmiddlebrooks.com
5/4/22 15:55 Key v. HMMA, HEA, and Dynamic - HEA's responses and objections to 30b	cbond@bradley.com
4/25/22 16:54 key v HMMA - look at ft. 7	Heather@HeatherLeonardPC.com
4/25/22 16:51 Key - EEOC screw up does not fall on us	Heather@HeatherLeonardPC.com
4/21/22 16:14 RE: Key v. HMMA, HEA, and Dynamic - 30(b)(6) Notice to Dynamic [IWOV	WRedmond@fordharrison.com
4/21/22 16:03 RE: 22-mc-505, Key v. Hyundai Motor Mfg. Ala. LLC	haikala_chambers@alnd.uscourts.gov
4/21/22 15:17 Automatic reply: 22-mc-505, Key v. Hyundai Motor Mfg. Ala. LLC	wbrown@lehrmiddlebrooks.com
4/21/22 15:15 RE: 22-mc-505, Key v. Hyundai Motor Mfg. Ala. LLC	KURT.FISCHER@EEOC.GOV
4/21/22 15:14 RE: 22-mc-505, Key v. Hyundai Motor Mfg. Ala. LLC	mmiller@bradley.com
4/21/22 15:13 RE: 22-mc-505, Key v. Hyundai Motor Mfg. Ala. LLC	dmiddlebrooks@lehrmiddlebrooks.com
4/21/22 15:11 RE: 22-mc-505, Key v. Hyundai Motor Mfg. Ala. LLC	WRedmond@fordharrison.com
4/21/22 15:08 22-mc-505, Key v. Hyundai Motor Mfg. Ala. LLC	haikala_chambers@alnd.uscourts.gov
4/21/22 12:58 Davita Key v. HMMA, et al.	jhix@lehrmiddlebrooks.com
4/21/22 12:13 FW: Activity in Case 2:22-mc-00505-MHH Key v. Hyundai Motor Manufact	KURT.FISCHER@EEOC.GOV
4/21/22 9:38 EEOC's Motion and Memorandum in Support of Its Motion to Quash Subp	KURT.FISCHER@EEOC.GOV
4/21/22 0:45 Notes on Phone	dmkey825@gmail.com
4/19/22 13:37 Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufact	efile_notice@almd.uscourts.gov
4/15/22 16:53 RE: Key v. Dynamic et al - Dynamic 30(b) notice	Heather@HeatherLeonardPC.com
4/15/22 14:21 Davita Key v. HMMA, et al	etaylor@lehrmiddlebrooks.com
4/15/22 13:42 Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufact	efile_notice@almd.uscourts.gov
4/15/22 13:25 Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufact	efile_notice@almd.uscourts.gov
4/15/22 9:21 RE: HMMA 30b6	Heather@HeatherLeonardPC.com
4/13/22 16:55 RE: HMMA 30b6	wbrown@lehrmiddlebrooks.com
4/13/22 12:06 Dynamic Security is suing Chris Hargrove	Heather@HeatherLeonardPC.com
4/12/22 17:05 Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufact	efile_notice@almd.uscourts.gov
4/12/22 17:00 Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufact	efile_notice@almd.uscourts.gov
4/12/22 13:34 Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufact	efile_notice@almd.uscourts.gov
4/12/22 13:31 Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufact	efile_notice@almd.uscourts.gov
4/12/22 10:49 RE: HMMA 30b6	wbrown@lehrmiddlebrooks.com
4/11/22 10:47 Automatic reply: Key v. HMMA, HEA, Dynamic - PL Discovery Response to	dmiddlebrooks@lehrmiddlebrooks.com
4/11/22 9:46 FW: HMMA 30b6	Heather@HeatherLeonardPC.com
4/11/22 9:45 RE: HMMA 30b6	Heather@HeatherLeonardPC.com

4/11/22 8:13	Re: Dynamic Security Interrogatory Responses	dmkey825@gmail.com
4/8/22 13:34	FW: HMMA 30b6	dmiddlebrooks@lehrmiddlebrooks.com
4/8/22 12:51	Re: Employment	dmkey825@gmail.com
4/8/22 7:51	HMMA 30b6	dmiddlebrooks@lehrmiddlebrooks.com
4/6/22 12:46	Re: Employment	dmkey825@gmail.com
4/5/22 13:06	Employment	dmkey825@gmail.com
4/5/22 12:29	RE: Key v HMMA, HEA, and Dynamic - 30(b)(6) Notice to HEA	cbond@bradley.com
4/5/22 9:59	RE: Key's 30 b 6 notice issued to HMMA	dmiddlebrooks@lehrmiddlebrooks.com
4/5/22 9:45	RE: Key's 30 b 6 notice issued to HMMA	Heather@HeatherLeonardPC.com
4/5/22 9:13	Key's 30 b 6 notice issued to HMMA	dmiddlebrooks@lehrmiddlebrooks.com
4/4/22 12:44	RE: Key v HMMA, HEA and Dynamic - follow up on deposition scheduling	Heather@HeatherLeonardPC.com
4/4/22 12:29	Draft notice to Dyanmic for your review and revision	Heather@HeatherLeonardPC.com
4/4/22 11:47	Key v HMMA, HEA, and Dynamic - 30(b)(6) Notice to HEA	Heather@HeatherLeonardPC.com
4/4/22 10:56	Key v HMMA, HEA, and Dynamic - 30(b)(6) Deposition Notice to HMMA	Heather@HeatherLeonardPC.com
4/1/22 8:45	Deposition of Davita Key	dmiddlebrooks@lehrmiddlebrooks.com
3/31/22 10:04	RE: Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the sch	dmiddlebrooks@lehrmiddlebrooks.com
3/30/22 17:02	Davita Key v. HMMA, et al	etaylor@lehrmiddlebrooks.com
3/30/22 8:57	RE: Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the sch	cbond@bradley.com
3/30/22 8:19	RE: Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the sch	Heather@HeatherLeonardPC.com
3/30/22 8:02	RE: Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the sch	dmiddlebrooks@lehrmiddlebrooks.com
3/28/22 13:16	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
3/28/22 9:05	2:19-cv-00767-ECM-SMD/ Key v. Hyundai Motor Manufacturing Alabama, Amber_Maddox	@almd.uscourts.gov
3/28/22 8:50	RE: Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the sch	Heather@HeatherLeonardPC.com
3/28/22 8:39	Re: Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the sch	mmiller@bradley.com
3/28/22 8:36	RE: Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the sch	dmiddlebrooks@lehrmiddlebrooks.com
3/28/22 8:32	RE: Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the sch	WRedmond@fordharrison.com
3/28/22 8:29	RE: Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the sch	Heather@HeatherLeonardPC.com
3/28/22 8:28	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
3/27/22 23:44	Key v. Hyundai [IWOV-WSACTIVE LLP.FID1997338]	WRedmond@fordharrison.com
3/27/22 14:25	Re: Phone	dmkey825@gmail.com
3/27/22 14:12	Re: Phone	dmkey825@gmail.com
3/27/22 14:06	Re: Phone	dmkey825@gmail.com
3/27/22 11:39	Re: Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the sch	mmiller@bradley.com

3/25/22 18:35	Dynamic Security, Inc. / Davita Key	CMcCloyn@fordharrison.com
3/25/22 17:46	Stacy Waldo has shared the folder 'Dynamic Security, Inc.- Davita M. Keys mail	mail@sf-notifications.com
3/25/22 17:11	Fwd: Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the sc	WRedmond@fordharrison.com
3/25/22 17:06	Re: Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the sch	WRedmond@fordharrison.com
3/25/22 16:20	RE: Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the sch	dmiddlebrooks@lehrmiddlebrooks.com
3/25/22 12:09	Key v HMMA, HEA and Dynamic - Plaintiff's motion to amend the schedul	Heather@HeatherLeonardPC.com
3/25/22 11:23	FW: Davita Key v. Hyundai Motor Manufacturing Alabama	Heather@HeatherLeonardPC.com
3/25/22 9:49	Phone	dmkey825@gmail.com
3/24/22 13:49	Discovery Signature	dmkey825@gmail.com
3/24/22 9:58	Re: Meeting	dmkey825@gmail.com
3/22/22 20:05	RE: Key v. HEA et al 2:10-cv-0767	cbond@bradley.com
3/22/22 19:47	Fwd: Davita Key v. Hyundai Motor Manufacturing Alabama	dmkey825@gmail.com
3/22/22 19:47	Meeting	dmkey825@gmail.com
3/22/22 15:48	Key v HMMA - subpoena notice	wbrown@lehrmiddlebrooks.com
3/21/22 13:34	RE: Key - Response to HEA Discovery	Heather@HeatherLeonardPC.com
3/21/22 11:37	RE: Key v. HMMA, HEA, Dynamic 2:19-cv-0767 - Rule 37 Letter [IWOV-WS	Heather@HeatherLeonardPC.com
3/21/22 10:56	Davita Key v. Hyndai - DRAFT ANSWERS (word doc) TO DYNAMIC'S DISCC	assistant@HeatherLeonardPC.com
3/21/22 10:40	RE: Davita Key - Discovery requests	assistant@HeatherLeonardPC.com
3/21/22 10:30	Davita Key - Discovery requests	assistant@HeatherLeonardPC.com
3/21/22 10:23	RE: Key v. HEA et al 2:10-cv-0767 - Dynamic Security Discovery Requests	assistant@HeatherLeonardPC.com
3/21/22 10:07	Re: Key v. HEA et al 2:10-cv-0767 - Plaintiff Discovery Responses	mmiller@bradley.com
3/18/22 20:38	Phone	dmkey825@gmail.com
3/18/22 17:52	Re: 2021 Taxes and discovery	dmkey825@gmail.com
3/18/22 16:55	Re: 2021 Taxes and discovery	dmkey825@gmail.com
3/18/22 16:53	Re: 2021 Taxes and discovery	dmkey825@gmail.com
3/18/22 16:51	Re: 2021 Taxes and discovery	dmkey825@gmail.com
3/18/22 16:50	Re: 2021 Taxes and discovery	dmkey825@gmail.com
3/18/22 16:45	Re: 2021 Taxes and discovery	dmkey825@gmail.com
3/18/22 16:43	Re: 2021 Taxes and discovery	dmkey825@gmail.com
3/18/22 16:38	Re: 2021 Taxes and discovery	dmkey825@gmail.com
3/18/22 15:15	RE: Key v. HMMA, HEA, Dynamic 2:19-cv-0767 - Rule 37 Letter [IWOV-WS	WRedmond@fordharrison.com
3/18/22 14:19	Re: 2021 Taxes and discovery	dmkey825@gmail.com
3/18/22 13:58	Re: 2021 Taxes and discovery	dmkey825@gmail.com

3/18/22 13:12 Re: 2021 Taxes and discovery	dmkey825@gmail.com
3/18/22 12:33 2021 Tax Returns	dmkey825@gmail.com
3/18/22 12:29 Re: 2021 Taxes and discovery	dmkey825@gmail.com
3/16/22 16:38 RE: Key v. HMMA, HEA, Dynamic 2:19-cv-0767 - Rule 37 Letter	WRedmond@fordharrison.com
3/15/22 9:06 Work	dmkey825@gmail.com
3/14/22 13:38 Automatic reply: Key v. HMMA et al - updated production	Heather@HeatherLeonardPC.com
3/11/22 16:52 Dynamic Security, Inc. / Davita Key	CMcCloyn@fordharrison.com
3/10/22 15:28 RE: Key's tax returns and earnings records from 2017 to the present	dmiddlebrooks@lehrmiddlebrooks.com
3/10/22 9:06 Davita Key v. Hyundai Motor Manufacturing Alabama, LLC, et al.	jhix@lehrmiddlebrooks.com
3/10/22 8:40 RE: Key v. HMMA, HEA, Dynamic 2:19-cv-0767 - Rule 37 Letter	WRedmond@fordharrison.com
3/9/22 15:57 Key's tax returns and earnings records from 2017 to the present	dmiddlebrooks@lehrmiddlebrooks.com
3/9/22 10:50 RE: Key v. HMMA, HEA, Dynamic 2:19-cv-0767 - Rule 37 Letter	Heather@HeatherLeonardPC.com
3/7/22 16:30 Automatic reply: Key v. HMMA, HEA, Dynamic 2:19-cv-0767 - Rule 37 Lett	Heather@HeatherLeonardPC.com
3/1/22 13:22 FW: Davita Key's Draft Answers to discovery requests from HEA	Heather@HeatherLeonardPC.com
3/1/22 11:20 Re: Question	dmkey825@gmail.com
2/28/22 15:10 RE: Scheduling Key's deposition plus others sought by a party.	dmiddlebrooks@lehrmiddlebrooks.com
2/28/22 10:10 Question	dmkey825@gmail.com
2/27/22 22:25 Automatic reply: Scheduling Key's deposition plus others sought by a part	Heather@HeatherLeonardPC.com
2/25/22 14:57 Scheduling Key's deposition plus others sought by a party.	dmiddlebrooks@lehrmiddlebrooks.com
2/24/22 17:10 RE: Key	dmiddlebrooks@lehrmiddlebrooks.com
2/24/22 16:57 RE: Key	Heather@HeatherLeonardPC.com
2/24/22 16:48 RE: Key	Heather@HeatherLeonardPC.com
2/24/22 16:10 Voicemail from LEHR MIDDLEBROO at (205) 323-9262 on Feb 24 2022 4:(voicemail-noreply@jivecommunications.com
2/24/22 16:06 FW: Message For (7865749161:9543144) 2022-02-24 04:02PM	Heather@HeatherLeonardPC.com
2/24/22 16:04 Key	dmiddlebrooks@lehrmiddlebrooks.com
2/23/22 10:09 Re: Case	dmkey825@gmail.com
2/23/22 9:54 RE: Case	Heather@HeatherLeonardPC.com
2/23/22 7:23 Case	dmkey825@gmail.com
2/22/22 16:13 FW: Haven't forgotten about you	dmiddlebrooks@lehrmiddlebrooks.com
2/21/22 12:57 RE: Haven't forgotten about you	dmiddlebrooks@lehrmiddlebrooks.com
2/21/22 12:45 Automatic reply: Haven't forgotten about you	cbond@bradley.com
2/21/22 12:44 Automatic reply: Haven't forgotten about you	sbullock@fordharrison.com
2/21/22 8:37 RE: Haven't forgotten about you	dmiddlebrooks@lehrmiddlebrooks.com

2/18/22 10:19 RE: Responses	assistant@HeatherLeonardPC.com
2/18/22 9:20 RE: Haven't forgotten about you	Heather@HeatherLeonardPC.com
2/18/22 9:19 RE: Haven't forgotten about you	dmiddlebrooks@lehrmiddlebrooks.com
2/18/22 9:17 RE: Haven't forgotten about you	Heather@HeatherLeonardPC.com
2/18/22 9:16 RE: Haven't forgotten about you	dmiddlebrooks@lehrmiddlebrooks.com
2/17/22 20:06 Responses	dmkey825@gmail.com
2/17/22 15:14 Document shared with you: DRAFT PLAINTIFF'S ANSWERS TO INTERROG	drive-shares-dm-noreply@google.com
2/17/22 14:32 RE: Responses	Heather@HeatherLeonardPC.com
2/17/22 14:21 Responses	dmkey825@gmail.com
2/17/22 13:49 FW: Haven't forgotten about you	Heather@HeatherLeonardPC.com
2/17/22 13:48 RE: Haven't forgotten about you	Heather@HeatherLeonardPC.com
2/17/22 13:32 RE: Haven't forgotten about you	dmiddlebrooks@lehrmiddlebrooks.com
2/17/22 13:27 Key v. Hyundai - DRAFT PLAINTIFF'S ANSWERS TO DISCOVERY	assistant@HeatherLeonardPC.com
2/17/22 11:31 FW: Davita Key v HMMA HEA and Dynamic - HEA's First Discovery Reques	Heather@HeatherLeonardPC.com
2/17/22 11:29 Davita Key v HMMA HEA and Dynamic - HEA's First Discovery Requests to	mmiller@bradley.com
2/17/22 11:08 Re: Haven't forgotten about you	dmiddlebrooks@lehrmiddlebrooks.com
2/17/22 11:00 Haven't forgotten about you	Heather@HeatherLeonardPC.com
2/14/22 16:33 Re: Potential Deposition Dates	dmkey825@gmail.com
2/14/22 15:43 Automatic reply: Potential Deposition Dates	Heather@HeatherLeonardPC.com
2/14/22 9:58 RE: Key v HMMA - deposition of Plaintiff	Heather@HeatherLeonardPC.com
2/14/22 9:57 Re: Key v HMMA - deposition of Plaintiff	dmiddlebrooks@lehrmiddlebrooks.com
2/14/22 9:25 Key v HMMA - deposition of Plaintiff	Heather@HeatherLeonardPC.com
2/10/22 8:09 Letter to counsel regarding scheduling deposition	dmiddlebrooks@lehrmiddlebrooks.com
2/8/22 11:12 Automatic reply: Employment	Heather@HeatherLeonardPC.com
2/8/22 9:04 RE: Employment	Heather@HeatherLeonardPC.com
2/8/22 8:01 Employment	dmkey825@gmail.com
2/6/22 22:46 Information	dmkey825@gmail.com
2/4/22 11:04 FW: Hyundai_Key - Response to Pltf's 1st Requests for Admission, Interro	lhawkins@bradley.com
1/28/22 11:38 RE: Plaintiff Supplemental Discovery Response to HMMA	Heather@HeatherLeonardPC.com
1/28/22 11:21 RE: D. Key v. HMMA, et al.	cbond@bradley.com
1/28/22 11:06 D. Key v. HMMA, et al.	jhix@lehrmiddlebrooks.com
1/28/22 10:41 RE: Key v. HMMA, Dynamic Security and HEA	mmiller@bradley.com
1/28/22 10:35 RE: Key v. HMMA, Dynamic Security and HEA	Heather@HeatherLeonardPC.com

1/28/22 9:52	RE: Key v. HMMA et al	Heather@HeatherLeonardPC.com
1/28/22 8:25	RE: Key v. HMMA, Dynamic Security and HEA	mmiller@bradley.com
1/27/22 11:58	RE: Key v. HMMA, Dynamic Security and HEA	mmiller@bradley.com
1/27/22 11:41	Davita Key v. HMMA, et al.	etaylor@lehrmiddlebrooks.com
1/27/22 10:59	Davita Key v. HMMA, et al.	etaylor@lehrmiddlebrooks.com
1/25/22 12:27	Re: Documents	dmkey825@gmail.com
1/25/22 11:42	RE: Plaintiff Supplemental Discovery Response to HMMA	wbrown@lehrmiddlebrooks.com
1/24/22 22:15	RE: Dynamic Discovery Responses [IWOV-WSACTIVE LLP.FID1997338]	WRedmond@fordharrison.com
1/24/22 18:02	Dynamic Discovery Responses [IWOV-WSACTIVE LLP.FID1997338]	WRedmond@fordharrison.com
1/24/22 12:37	Documents	dmkey825@gmail.com
1/19/22 16:31	Automatic reply: Plaintiff Supplemental Discovery Response to HMMA	wbrown@lehrmiddlebrooks.com
1/19/22 16:31	Automatic reply: Plaintiff Supplemental Discovery Response to HMMA	dmiddlebrooks@lehrmiddlebrooks.com
1/18/22 14:27	RE: Key v HMMA, et al - Dynamic's discovery responses [IWOV-WSACTIVE LLP.FID1997338]	Heather@HeatherLeonardPC.com
1/18/22 10:37	RE: Key v HMMA, et al - Dynamic's discovery responses [IWOV-WSACTIVE LLP.FID1997338]	WRedmond@fordharrison.com
1/18/22 9:33	Key v HMMA, et al - Dynamic's discovery responses	Heather@HeatherLeonardPC.com
1/14/22 15:14	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/14/22 15:13	RE: Key - HMMA supplemental responses	Heather@HeatherLeonardPC.com
1/14/22 14:33	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/14/22 14:01	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/14/22 13:10	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/14/22 12:10	PI IROG	dmkey825@gmail.com
1/13/22 9:52	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/13/22 9:29	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
1/12/22 13:04	Rule 37 letter to Dynamic in Key - what I've done so far	Heather@HeatherLeonardPC.com
1/12/22 12:59	FW: Key v. Hyundai et al. - Dynamic Security's Objections to Plaintiff's Fir	Heather@HeatherLeonardPC.com
1/12/22 8:27	RE: Key v HMMA: Plaintiff's discovery responses	wbrown@lehrmiddlebrooks.com
1/11/22 19:11	RE: Key v HMMA: Plaintiff's discovery responses	Heather@HeatherLeonardPC.com
1/10/22 16:15	RE: Key v. HMMA, Dynamic Security and HEA	mmiller@bradley.com
1/10/22 14:39	Re: Addresses needed	dmkey825@gmail.com
1/10/22 12:06	Re: Addresses needed	dmkey825@gmail.com
1/10/22 11:54	Key Time	Heather@HeatherLeonardPC.com
1/10/22 11:21	Re: Addresses needed	dmkey825@gmail.com
1/10/22 11:20	RE: Key v. HMMA, Dynamic Security and HEA	Heather@HeatherLeonardPC.com

1/10/22 11:14 Fwd: letter	dmkey825@gmail.com
1/10/22 10:57 RE: Key v HMMA: Plaintiff's discovery responses	wbrown@lehrmiddlebrooks.com
1/10/22 10:32 RE: Key v HMMA: Plaintiff's discovery responses	Heather@HeatherLeonardPC.com
1/10/22 9:58 RE: Key v HMMA: Plaintiff's discovery responses	wbrown@lehrmiddlebrooks.com
1/8/22 11:07 Key v. HMMA, Dynamic Security and HEA	mmiller@bradley.com
1/4/22 16:11 RE: Key v HMMA, HEA, Dynamic - Plaintiff's discovery requests to Dynami	Heather@HeatherLeonardPC.com
1/4/22 9:58 RE: Key v HMMA: Plaintiff's discovery responses	wbrown@lehrmiddlebrooks.com
12/31/21 16:44 RE: Key v HMMA, HEA, Dynamic - Plaintiff's discovery requests to Dynami	WRedmond@fordharrison.com
12/31/21 11:34 FW: Key v HMMA: Plaintiff's discovery responses	Heather@HeatherLeonardPC.com
12/28/21 9:13 RE: Key v HMMA: Plaintiff's discovery responses	wbrown@lehrmiddlebrooks.com
12/20/21 11:01 Davita Key v. HMMA, et al.	etaylor@lehrmiddlebrooks.com
12/17/21 17:42 Re: Key	dmiddlebrooks@lehrmiddlebrooks.com
12/17/21 17:01 RE: Key	Heather@HeatherLeonardPC.com
12/13/21 16:43 Re: Handbooks	dmkey825@gmail.com
12/13/21 16:32 Key v HMMA, HEA, Dynamic - discovery requests to HEA	Heather@HeatherLeonardPC.com
12/13/21 16:26 FW: Key v HMMA: Plaintiff's discovery responses	Heather@HeatherLeonardPC.com
12/13/21 15:34 RE: Key v HMMA, et al - HEA Insurance Coverage	Heather@HeatherLeonardPC.com
12/13/21 14:59 RE: Key v HMMA, et al - HEA Insurance Coverage	yurie@deweesebae.com
12/13/21 14:48 FW: Key	dmiddlebrooks@lehrmiddlebrooks.com
12/11/21 12:13 Handbooks	dmkey825@gmail.com
12/10/21 16:26 Key v HMMA: Plaintiff's discovery responses	wbrown@lehrmiddlebrooks.com
12/10/21 15:28 Davita Key v. HMMA, et al.	etaylor@lehrmiddlebrooks.com
12/10/21 14:33 HMMA's Supplemental document production in response to RFP #1	dmiddlebrooks@lehrmiddlebrooks.com
12/10/21 10:59 RE: Key v. Hyundai et al - Dynamic Security Handbook	Heather@HeatherLeonardPC.com
12/10/21 9:21 RE: Key v HMMA - objection to HMMA's designation of documents as con	Heather@HeatherLeonardPC.com
12/10/21 9:19 RE: Key v HMMA - objection to HMMA's designation of documents as con	dmiddlebrooks@lehrmiddlebrooks.com
12/10/21 9:14 RE: Key v HMMA - objection to HMMA's designation of documents as con	Heather@HeatherLeonardPC.com
12/10/21 9:12 RE: Key v HMMA - objection to HMMA's designation of documents as con	dmiddlebrooks@lehrmiddlebrooks.com
12/9/21 14:47 RE: Key v HMMA - objection to HMMA's designation of documents as con	Heather@HeatherLeonardPC.com
12/9/21 14:45 RE: Key v HMMA - objection to HMMA's designation of documents as con	dmiddlebrooks@lehrmiddlebrooks.com
12/9/21 12:13 Key v HMMA/HEA/Dynamic - draft discovery to HEA for your review and r	Heather@HeatherLeonardPC.com
12/9/21 11:27 RE: Draft 30(b)(6) to HMMA	Heather@HeatherLeonardPC.com
12/9/21 11:10 FW: Identities of complaining parties redacted	Heather@HeatherLeonardPC.com

12/9/21 11:09	Draft 30(b)(6) to HMMA	Heather@HeatherLeonardPC.com
12/9/21 10:57	Key v HMMA, HEA, Dynamic - Plaintiff's discovery requests to Dynamic	Heather@HeatherLeonardPC.com
12/9/21 10:55	RE: Draft discovery to Dynamic in Key v HMMA, HEA, and Dynamic	Heather@HeatherLeonardPC.com
12/9/21 9:49	RE: [NELA-AL] : Identities of complaining parties redacted	Mail@ConnectedCommunity.org
12/9/21 9:22	[NELA-AL] : Identities of complaining parties redacted	Mail@ConnectedCommunity.org
12/9/21 9:01	Key v HMMA, et al - HEA Insurance Coverage	Heather@HeatherLeonardPC.com
12/9/21 8:56	RE: Key v HMMA - objection to HMMA's designation of documents as con	Heather@HeatherLeonardPC.com
12/8/21 15:51	Davita Key v. HMMA, et al.	etaylor@lehrmiddlebrooks.com
12/8/21 15:16	Draft discovery to Dynamic in Key v HMMA, HEA, and Dynamic	Heather@HeatherLeonardPC.com
12/7/21 16:16	Re: Key v Hyundai - Interrogatory Responses to HMMA	dmkey825@gmail.com
12/7/21 13:24	Re: Key v Hyundai - Interrogatory Responses to HMMA	dmkey825@gmail.com
12/7/21 13:18	RE: Key v. Hyundai et al - 2:19-CV-767-ECM - PL Disc resp to HMMA	dmiddlebrooks@lehrmiddlebrooks.com
12/7/21 13:03	Re: Key v Hyundai - Interrogatory Responses to HMMA	dmkey825@gmail.com
12/7/21 11:31	RE: Key - Production	Heather@HeatherLeonardPC.com
12/7/21 11:31	Automatic reply: Key v. Hyundai et al - 2:19-CV-767-ECM - PL Disc resp to	wbrown@lehrmiddlebrooks.com
12/7/21 10:35	Re: Key v Hyundai - Interrogatory Responses to HMMA	dmkey825@gmail.com
12/7/21 8:39	RE: Key v. Hyundai et al - 2:19-CV-767-ECM - PL Disc resp to HMMA	dmiddlebrooks@lehrmiddlebrooks.com
12/6/21 20:39	Case	dmkey825@gmail.com
12/6/21 20:22	Photos	dmkey825@gmail.com
12/6/21 19:49	Re: Key v Hyundai - Interrogatory Responses to HMMA	dmkey825@gmail.com
12/6/21 19:37	2020 taxes	dmkey825@gmail.com
12/6/21 19:37	2019 taxes	dmkey825@gmail.com
12/6/21 19:36	2018 taxes	dmkey825@gmail.com
12/6/21 19:35	2017 Taxes	dmkey825@gmail.com
12/6/21 19:31	Re: Key v Hyundai - Interrogatory Responses to HMMA	dmkey825@gmail.com
12/6/21 12:19	RE: Key v. Hyundai et al - Discovery Response Draft	Heather@HeatherLeonardPC.com
12/6/21 10:45	Re: Key v Hyundai - Interrogatory Responses to HMMA	dmkey825@gmail.com
12/6/21 10:35	Signature	dmkey825@gmail.com
12/6/21 10:14	Re: Key v Hyundai - Interrogatory Responses to HMMA	dmkey825@gmail.com
12/6/21 10:03	RE: Key v Hyundai - Interrogatory Responses to HMMA	Heather@HeatherLeonardPC.com
12/4/21 14:33	Re: Information	dmkey825@gmail.com
12/3/21 17:57	Information	dmkey825@gmail.com
12/3/21 17:56	Fwd:	dmkey825@gmail.com

12/3/21 17:55 Fwd: Mailroom Position	dmkey825@gmail.com
12/3/21 17:54 Fwd: Mailroom Position	dmkey825@gmail.com
12/3/21 17:53 Fwd: Fwd: letter	dmkey825@gmail.com
12/3/21 17:41 Fwd: Natural Hair Discrimination	dmkey825@gmail.com
12/3/21 17:40 Fwd: Your ATL column	dmkey825@gmail.com
12/3/21 17:40 Fwd: Support	dmkey825@gmail.com
12/3/21 17:38 Fwd: ColorOfChange.com Contact form""	dmkey825@gmail.com
12/3/21 17:35 Fwd: Natural Hair Discrimination in workplace	dmkey825@gmail.com
12/3/21 17:34 Fwd: Hair Discrimination	dmkey825@gmail.com
12/3/21 17:30 Re: Information	dmkey825@gmail.com
12/3/21 17:04 Re: Information	dmkey825@gmail.com
12/3/21 17:02 Fwd: Natural Hair Discrimination in the workplace	dmkey825@gmail.com
12/3/21 16:55 Re: Information	dmkey825@gmail.com
12/3/21 16:49 Re: Information	dmkey825@gmail.com
12/3/21 15:58 Re: IMG_20200319_0013.pdf, IMG_20200319_0019.pdf + 32 more items	dmkey825@gmail.com
12/3/21 15:26 Automatic reply: Information	Heather@HeatherLeonardPC.com
12/2/21 14:50 RE: Information	Heather@HeatherLeonardPC.com
12/2/21 14:36 Re: Information	dmkey825@gmail.com
12/2/21 13:57 Information	dmkey825@gmail.com
12/1/21 11:38 RE: Davita Key v. HMMA, et al. - request for an extension to respond to di	Heather@HeatherLeonardPC.com
12/1/21 11:27 RE: Davita Key v. HMMA, et al. - request for an extension to respond to di	wbrown@lehrmiddlebrooks.com
12/1/21 11:07 RE: Davita Key v. HMMA, et al. - request for an extension to respond to di	Heather@HeatherLeonardPC.com
11/30/21 13:07 FW: Key v HMMA - pleading comparison (due by 12/1)	Heather@HeatherLeonardPC.com
11/29/21 17:16 Re: Documents	dmkey825@gmail.com
11/29/21 16:40 Automatic reply: Documents	Heather@HeatherLeonardPC.com
11/24/21 10:41 Documents	dmkey825@gmail.com
11/19/21 14:10 Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
11/19/21 14:04 Key Witnesses We May Want to Depose	Heather@HeatherLeonardPC.com
11/19/21 12:55 Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
11/19/21 10:25 Your Parking Receipt	alerts@parkmobileglobal.com
11/12/21 22:01 Additional Information	dmkey825@gmail.com
11/12/21 21:19 Answers	dmkey825@gmail.com
11/12/21 21:16 2017 Job Applications	dmkey825@gmail.com

11/12/21 13:48	Davita Key Interrogatories Answers	dmkey825@gmail.com
11/10/21 15:39	Re: Attorney client communication - Key v. Hyundai - Discovery questions	dmkey825@gmail.com
11/9/21 13:58	Your call	Heather@HeatherLeonardPC.com
11/8/21 11:24	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
11/3/21 20:29	Automatic reply: Key v. HMMA et al	dmiddlebrooks@lehrmiddlebrooks.com
11/2/21 16:32	RE: For your review and revision - first draft of discovery to HMMA	Heather@HeatherLeonardPC.com
11/2/21 14:08	FW: Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC, Hyundai	Heather@HeatherLeonardPC.com
11/2/21 12:01	For your review and revision - first draft of discovery to HMMA	Heather@HeatherLeonardPC.com
11/2/21 11:36	Davita M. Key v. Hyundai Motor Manufacturing Alabama, LLC, Hyundai En	Heather@HeatherLeonardPC.com
11/1/21 12:40	Davita Key v. HMMA, et al.	jhix@lehrmiddlebrooks.com
10/14/21 14:07	Davita Key v. HMMA, et al.	jhix@lehrmiddlebrooks.com
10/13/21 14:01	RE: Key v. HMMA, HEA, and Dynamic - request for a copy of Dynamic's ins	Heather@HeatherLeonardPC.com
10/13/21 13:59	RE: Key v. HMMA, HEA, and Dynamic - request for a copy of Dynamic's ins	WRedmond@fordharrison.com
10/13/21 13:39	Key v. HMMA, HEA, and Dynamic - request for a copy of Dynamic's insura	Heather@HeatherLeonardPC.com
10/13/21 11:53	Key - Word versions of the objections to HMMA and HEA confidentiality o	Heather@HeatherLeonardPC.com
10/13/21 11:47	Davita Key v HMA, HEA, and Dynamic - indexes of defense document proc	Heather@HeatherLeonardPC.com
10/13/21 10:48	RE: Key v HMMA - objection to HMMA's designation of documents as con	Heather@HeatherLeonardPC.com
10/13/21 10:41	Davita Key v. HMMA, et al.	jhix@lehrmiddlebrooks.com
10/13/21 8:58	RE: Key v HMMA - objection to HMMA's designation of documents as con	dmiddlebrooks@lehrmiddlebrooks.com
10/12/21 19:13	RE: Davita Key v. Dynamic Security, Inc. - Initial Disclosures and Productio	WRedmond@fordharrison.com
10/12/21 17:00	Davita Key v. Dynamic Security, Inc. - Initial Disclosures and Production	CMcClown@fordharrison.com
10/12/21 16:12	Key v HMMA - objection to HMMA's designation of documents as confide	Heather@HeatherLeonardPC.com
10/12/21 15:41	Key v HMMA, HEA, and Dynamic - objections to HEAs designations of docu	Heather@HeatherLeonardPC.com
10/12/21 14:49	Key v HMMA et al. - HEA's Initial Disclosures	yurie@deweesebae.com
10/12/21 14:31	RE: Key v HMMA - Def HMMA initial disclosures	Heather@HeatherLeonardPC.com
10/12/21 14:22	RE: Key v HMMA - Def HMMA initial disclosures	dmiddlebrooks@lehrmiddlebrooks.com
10/12/21 14:20	Key v HMMA - Def HMMA initial disclosures	Heather@HeatherLeonardPC.com
10/12/21 10:28	Davita Key v. HMMA, et al.	jhix@lehrmiddlebrooks.com
10/7/21 17:14	Re: Case	dmkey825@gmail.com
10/7/21 10:00	RE: Draft Rule 26 report in Key v HMMA	yurie@deweesebae.com
10/7/21 9:15	RE: Draft Rule 26 report in Key v HMMA	wbrown@lehrmiddlebrooks.com
10/7/21 9:04	RE: Draft Rule 26 report in Key v HMMA	Heather@HeatherLeonardPC.com
10/7/21 8:59	Re: Draft Rule 26 report in Key v HMMA	WRedmond@fordharrison.com

10/6/21 16:02	Case	dmkey825@gmail.com
9/24/21 9:59	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
9/24/21 9:23	RE: 2:19-cv-00767-ECM-SMD Key v HMMA et al - Word Version of Propos	Heather@HeatherLeonardPC.com
9/24/21 7:39	RE: 2:19-cv-00767-ECM-SMD Key v HMMA et al - Word Version of Propos	propord_Marks@almd.uscourts.gov
9/23/21 17:49	2:19-cv-00767-ECM-SMD Key v HMMA et al - Word Version of Proposed P	Heather@HeatherLeonardPC.com
9/23/21 17:48	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
9/23/21 17:23	RE: Draft Rule 26 report in Key v HMMA	wbrown@lehrmiddlebrooks.com
9/23/21 17:21	Automatic reply: Draft Rule 26 report in Key v HMMA	wbrown@lehrmiddlebrooks.com
9/23/21 17:20	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
9/23/21 17:20	RE: Draft Rule 26 report in Key v HMMA	Heather@HeatherLeonardPC.com
9/23/21 17:00	RE: Draft Rule 26 report in Key v HMMA	wbrown@lehrmiddlebrooks.com
9/23/21 16:56	RE: Draft Rule 26 report in Key v HMMA	Heather@HeatherLeonardPC.com
9/23/21 16:53	RE: Draft Rule 26 report in Key v HMMA	wbrown@lehrmiddlebrooks.com
9/23/21 16:39	RE: Draft Rule 26 report in Key v HMMA	wbrown@lehrmiddlebrooks.com
9/23/21 16:03	RE: Draft Rule 26 report in Key v HMMA	yurie@deweesebae.com
9/23/21 16:02	Re: Draft Rule 26 report in Key v HMMA	WRedmond@fordharrison.com
9/23/21 15:50	RE: Draft Rule 26 report in Key v HMMA	dmiddlebrooks@lehrmiddlebrooks.com
9/23/21 15:32	RE: Draft Rule 26 report in Key v HMMA	Heather@HeatherLeonardPC.com
9/23/21 15:25	RE: Draft Rule 26 report in Key v HMMA	dmiddlebrooks@lehrmiddlebrooks.com
9/23/21 13:57	RE: Key v HMMA et al - Privacy Protective Order	dmiddlebrooks@lehrmiddlebrooks.com
9/23/21 13:56	RE: Key v HMMA et al - Privacy Protective Order	yurie@deweesebae.com
9/23/21 13:26	Key v HMMA et al - Privacy Protective Order	Heather@HeatherLeonardPC.com
9/23/21 13:18	RE: Draft Rule 26 report in Key v HMMA	Heather@HeatherLeonardPC.com
9/23/21 9:51	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
9/23/21 9:28	RE: Draft Rule 26 report in Key v HMMA	Heather@HeatherLeonardPC.com
9/23/21 9:18	Key	Heather@HeatherLeonardPC.com
9/22/21 20:53	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
9/22/21 16:48	RE: Draft Rule 26 report in Key v HMMA	wbrown@lehrmiddlebrooks.com
9/22/21 15:06	RE: Draft Rule 26 report in Key v HMMA	wbrown@lehrmiddlebrooks.com
9/21/21 16:01	RE: Draft Rule 26 report in Key v HMMA	wbrown@lehrmiddlebrooks.com
9/21/21 16:01	RE: Draft Rule 26 report in Key v HMMA	wbrown@lehrmiddlebrooks.com
9/21/21 15:55	RE: Draft Rule 26 report in Key v HMMA	Heather@HeatherLeonardPC.com
9/21/21 15:53	RE: Draft Rule 26 report in Key v HMMA	wbrown@lehrmiddlebrooks.com

9/17/21 12:02	Draft Rule 26 report in Key v HMMA	Heather@HeatherLeonardPC.com
9/14/21 17:59	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
9/14/21 12:24	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
9/13/21 16:09	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
9/9/21 10:04	Re: Key v. HMMA, et al. - Rule 26 report and proposed protective order	wbrown@lehrmiddlebrooks.com
9/9/21 10:04	RE: Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather@HeatherLeonardPC.com
9/9/21 10:03	RE: Key v. HMMA, et al. - Rule 26 report and proposed protective order	WRedmond@fordharrison.com
9/9/21 10:00	RE: Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather@HeatherLeonardPC.com
9/9/21 10:00	RE: Key v. HMMA, et al. - Rule 26 report and proposed protective order [I\	WRedmond@fordharrison.com
9/9/21 9:53	RE: Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather@HeatherLeonardPC.com
9/9/21 9:47	NELA-AL - -- Drafting a Complaint That Can Withstand a 12(b)(6) Motion t	Heather@HeatherLeonardPC.com
9/8/21 14:23	RE: Key v. HMMA, et al. - Rule 26 report and proposed protective order	yurie@deweesebae.com
9/8/21 13:06	RE: Key v. HMMA, et al. - Rule 26 report and proposed protective order	wbrown@lehrmiddlebrooks.com
9/8/21 9:54	RE: Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather@HeatherLeonardPC.com
9/1/21 17:39	Employment update	dmkey825@gmail.com
9/1/21 14:56	Key v. HMMA, et al. - Rule 26 report and proposed protective order	Heather@HeatherLeonardPC.com
9/1/21 14:12	RE: Key v. HMMA - things for you to bless before I send to the defendants	Heather@HeatherLeonardPC.com
9/1/21 13:20	Re: Update on Hundai/Dynamic Case	dmkey825@gmail.com
9/1/21 13:18	Key v. HMMA - things for you to bless before I send to the defendants	Heather@HeatherLeonardPC.com
9/1/21 9:51	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
8/31/21 13:19	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
8/31/21 12:20	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
7/21/21 13:59	Re: Update - Key v Hyundai	dmkey825@gmail.com
7/21/21 13:51	Automatic reply: Update - Key v Hyundai	Heather@HeatherLeonardPC.com
7/20/21 18:27	Re: Update	dmkey825@gmail.com
7/16/21 12:38	Re: Update	dmkey825@gmail.com
7/14/21 19:18	Update	dmkey825@gmail.com
6/3/21 11:58	Update	dmkey825@gmail.com
4/30/21 16:42	Hello	dmkey825@gmail.com
4/5/21 10:53	How hair discrimination impacts Black Americans in their personal lives a	Heather@HeatherLeonardPC.com
1/22/21 10:48	Re: Case	dmkey825@gmail.com
1/21/21 21:41	Case	dmkey825@gmail.com
11/24/20 9:00	Case	dmkey825@gmail.com

11/9/20 14:32	Case	dmkey825@gmail.com
10/30/20 14:13	Re: Case	dmkey825@gmail.com
10/30/20 6:33	Case	dmkey825@gmail.com
10/13/20 15:08	Re: Case	dmkey825@gmail.com
10/13/20 9:13	Re: Case	dmkey825@gmail.com
10/12/20 10:08	Re: Case	dmkey825@gmail.com
10/11/20 8:35	Case	dmkey825@gmail.com
8/28/20 9:37	Paycheck	dmkey825@gmail.com
8/24/20 12:55	Re: Case	dmkey825@gmail.com
8/24/20 12:43	Re: Case	dmkey825@gmail.com
8/22/20 10:26	Case	dmkey825@gmail.com
7/27/20 11:51	Re: Case	dmkey825@gmail.com
7/27/20 10:45	Case	dmkey825@gmail.com
7/15/20 18:12	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
7/15/20 16:57	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
7/15/20 13:49	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
7/8/20 17:24	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
7/8/20 14:09	RE: Key v Hyundai - response to MTD	Heather@HeatherLeonardPC.com
7/8/20 9:19	Key v Hyundai - response to MTD	Heather@HeatherLeonardPC.com
7/6/20 15:06	RE: Key v. Hyundai	Heather@HeatherLeonardPC.com
7/3/20 12:01	Crown Coalition	dmkey825@gmail.com
6/26/20 12:33	Re: Case	dmkey825@gmail.com
6/26/20 12:08	RE: Case	Heather@HeatherLeonardPC.com
6/25/20 22:50	Case	dmkey825@gmail.com
6/17/20 14:29	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
6/16/20 22:26	Change of Address	dmkey825@gmail.com
6/16/20 7:53	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
6/16/20 7:46	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
6/15/20 19:09	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
6/15/20 16:40	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
6/12/20 15:43	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
6/2/20 13:24	Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
6/2/20 12:03	RE: Key v. HMMA, HEA, Dynamic	Heather@HeatherLeonardPC.com

6/2/20 11:56 FW: Key v. HMMA, HEA, Dynamic	Heather@HeatherLeonardPC.com
6/2/20 11:55 FW: Key v. HMMA, HEA, Dynamic	Heather@HeatherLeonardPC.com
6/2/20 11:54 RE: Key v. HMMA, HEA, Dynamic	Heather@HeatherLeonardPC.com
6/2/20 10:24 Re: Case	dmkey825@gmail.com
6/2/20 6:33 Case	dmkey825@gmail.com
6/1/20 14:34 RE: Key v. HMMA, HEA, Dynamic	wbrown@lehrmiddlebrooks.com
6/1/20 13:42 Key v. HMMA, HEA, Dynamic	wbrown@lehrmiddlebrooks.com
6/1/20 12:22 Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
6/1/20 12:05 RE: Key - Amended Complaint	Heather@HeatherLeonardPC.com
6/1/20 12:02 Key - Amended Complaint	Heather@HeatherLeonardPC.com
5/29/20 14:05 Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
5/27/20 16:45 Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
5/27/20 8:42 Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
5/21/20 14:35 Re: Natural Hair Discrimination	deg69@drexel.edu
5/21/20 12:36 RE: Natural Hair Discrimination	Heather@HeatherLeonardPC.com
5/21/20 6:30 Re: Natural Hair Discrimination	deg69@drexel.edu
5/20/20 16:42 Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manufactu	efile_notice@almd.uscourts.gov
5/20/20 16:23 FW: Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manu	Heather@HeatherLeonardPC.com
5/20/20 16:22 FW: Activity in Case 2:19-cv-00767-ECM-SMD Key v. Hyundai Motor Manu	Heather@HeatherLeonardPC.com
5/20/20 16:01 RE: Key v. Hyundai Documents	Heather@HeatherLeonardPC.com
5/20/20 15:21 RE: Key Complaint	Heather@HeatherLeonardPC.com
5/20/20 15:08 Key Complaint	Heather@HeatherLeonardPC.com
5/20/20 13:23 RE: Key v. Hyundai	Heather@HeatherLeonardPC.com
5/20/20 13:23 RE: Key v Hyunda - motion to amend	Heather@HeatherLeonardPC.com
5/20/20 12:54 RE: Discrimination - Natural Hair	Heather@HeatherLeonardPC.com
5/20/20 11:24 Key - Notice of Appearance for Leslie	Heather@HeatherLeonardPC.com
5/20/20 9:46 FW: Discrimination - Natural Hair	Heather@HeatherLeonardPC.com
5/19/20 17:27 FW: Hair discrimination	Heather@HeatherLeonardPC.com
5/19/20 16:40 FW: [NELA Discrimination] : Discrimination - Natural Hair	Heather@HeatherLeonardPC.com
5/19/20 16:40 Key - Response to MTD - what I have so far	Heather@HeatherLeonardPC.com
5/19/20 16:25 Natural Hair Discrimination	Heather@HeatherLeonardPC.com
5/19/20 16:21 RE: [NELA-AL] : Discrimination - Natural Hair	Mail@ConnectedCommunity.org
5/19/20 16:11 [NELA-AL] : Discrimination - Natural Hair	Mail@ConnectedCommunity.org

5/19/20 14:55	RE: Key v Hyundai Motor Manufacturing Alabama, LLC, et al. - do defend	dmiddlebrooks@lehrmiddlebrooks.com
5/19/20 13:38	Key v Hyunda - motion to amend	Heather@HeatherLeonardPC.com
5/19/20 13:23	Key v Hyundai Motor Manufacturing Alabama, LLC, et al. - do defendants	Heather@HeatherLeonardPC.com
5/19/20 11:17	RE: Davita Key v. Hyundai et all	Heather@HeatherLeonardPC.com
5/19/20 10:53	FW: Message For (7865749161:7072931) 2020-05-19 10:52AM	Heather@HeatherLeonardPC.com
5/12/20 17:03	Re: Case	dmkey825@gmail.com
5/12/20 16:21	Case	dmkey825@gmail.com
5/6/20 12:44	Case	dmkey825@gmail.com
4/24/20 19:33	Fwd: EEOC CHARGE	dmkey825@gmail.com
4/24/20 19:33	Fwd: EEOC CASE 420-2019-00128	dmkey825@gmail.com
4/24/20 19:31	Fwd: EEOC CHARGE #: 420-2019-00128	dmkey825@gmail.com
4/24/20 19:31	Fwd: EEOC 420-2019-00128	dmkey825@gmail.com
4/24/20 19:31	Fwd: CASE NO: 420-2019-00128	dmkey825@gmail.com
4/24/20 19:30	Fwd: EEOC Case:420-2019-00128	dmkey825@gmail.com
4/24/20 19:30	Fwd: EEOC Case 420-2019-00128	dmkey825@gmail.com
4/24/20 19:30	Fwd: EEOC Case 420-2019-00128	dmkey825@gmail.com
4/24/20 19:30	Fwd: EEOC Case 420-2019-00128	dmkey825@gmail.com
4/24/20 19:30	Fwd: Automatic reply: EEOC Case 420-2019-00128	dmkey825@gmail.com
4/24/20 19:29	Fwd: EEOC Charge 420-2019-00128 Key vs. Hyundai	dmkey825@gmail.com
4/24/20 19:29	Fwd: EEOC Document	dmkey825@gmail.com
4/24/20 19:29	Fwd: EEOC Charge 420-2019-00128 Key vs. Hyundai	dmkey825@gmail.com
4/24/20 19:29	Re: EEOC emails	dmkey825@gmail.com
4/24/20 16:21	EEOC emails	dmkey825@gmail.com
4/24/20 16:14	Re: Hyundai Questions	dmkey825@gmail.com
4/22/20 14:54	RE: Think this will help with the Key case?	Heather@HeatherLeonardPC.com
4/22/20 14:16	Re: Hyundai Questions	dmkey825@gmail.com
4/22/20 14:14	Fwd: EEOC Response to Status Inquiry / Charge Number 846-2017-32787	dmkey825@gmail.com
4/22/20 14:14	Fwd: EEOC case #846-2017-32787	dmkey825@gmail.com
4/22/20 14:13	Fwd: EEOC Case	dmkey825@gmail.com
4/22/20 14:12	Fwd: EEOC CASE	dmkey825@gmail.com
4/22/20 14:12	Fwd: Rebuttal Response	dmkey825@gmail.com
4/22/20 14:10	Re: Hyundai Questions	dmkey825@gmail.com
4/22/20 14:08	Think this will help with the Key case?	Heather@HeatherLeonardPC.com

4/15/20 13:31	Re: Phone Records (July 2017-September 2017)	dmkey825@gmail.com
4/15/20 9:22	Fwd: [NELA-AL] : 11th Cir says P gets discovery to identify defendants	Heather@HeatherLeonardPC.com
4/15/20 7:33	Phone Records (July 2017-September 2017)	dmkey825@gmail.com
4/2/20 17:36	Re: Attorney/Client (Phone Records)	dmkey825@gmail.com
4/1/20 15:03	can we move our call up to now or push it back - jim is cooking fish and it	Heather@HeatherLeonardPC.com
3/31/20 13:34	Accepted: RE: Key, Davita - signed contract and sharepoint	Heather@HeatherLeonardPC.com
3/31/20 13:20	RE: Key, Davita - signed contract and sharepoint	Heather@HeatherLeonardPC.com
3/31/20 13:16	Re: Attorney/Client (Phone Records)	dmkey825@gmail.com
3/27/20 14:20	Key Case Information	dmkey825@gmail.com
3/27/20 9:37	Contract	dmkey825@gmail.com
3/24/20 17:09	RE: Key, Davita - signed contract and sharepoint	Heather@HeatherLeonardPC.com
3/24/20 15:29	Attorney/Client (Phone Records)	dmkey825@gmail.com
3/24/20 15:23	Re: Agreement for Representation - Signature required	dmkey825@gmail.com
3/21/20 23:29	Davita Key-Hyundai - Invitation to collaborate	dmkey825@gmail.com
3/20/20 10:28	Davita Key Fee Agreement	Heather@HeatherLeonardPC.com
3/19/20 22:07	Re: Case Information and Consult	dmkey825@gmail.com
3/19/20 22:02	IMG_20200319_0013.pdf, IMG_20200319_0019.pdf + 32 more items	dmkey825@gmail.com
3/19/20 12:41	Re: Case Information and Consult	dmkey825@gmail.com
3/17/20 13:53	Re: Thursday Meeting	dmkey825@gmail.com
3/17/20 13:43	RE: Davita Key Meeting	Heather@HeatherLeonardPC.com
3/17/20 11:12	RE: Davita Key Meeting	Heather@HeatherLeonardPC.com
3/16/20 14:04	Re: Thursday Meeting	dmkey825@gmail.com
3/16/20 13:48	RE: Davita Key Meeting	Heather@HeatherLeonardPC.com
3/16/20 13:31	Thursday Meeting	dmkey825@gmail.com
3/12/20 11:16	Davita Key v. HMMA, et al.	jhix@lehrmiddlebrooks.com
3/9/20 14:06	Re: Employment Title VII Referral Case (Davita Key)	lawyernix@gmail.com
3/9/20 13:25	Re: Davita Key v Hyundai Motor Manufacturing, Alabama- EEOC# 420-201	dmkey825@gmail.com
3/9/20 12:51	Re: Key v. Hyundai et al - Confirmation of March 19 Meeting	dmkey825@gmail.com
3/9/20 12:49	Fwd: Davita Key v Hyundai Motor Manufacturing, Alabama- EEOC# 420-201	dmkey825@gmail.com
3/9/20 10:27	RE: Employment Title VII Referral Case (Davita Key)	dpevans@evanslawpc.com
3/6/20 15:45	Voicemail from WIRELESS CALLER at (334) 200-7078 on Mar 6 2020 3:44	voicemail-noreply@jivecommunications.com